

APPENDIX II AGENCY COORDINATION AND COMMENTS

The following public agencies were all contacted initially in 2004. Those that responded were contacted again in 2006 following a revision of the initial Environmental Assessment that addressed the 2004 comments. Several agencies were also contacted in 2008 for follow-up or missing information. Following is the correspondence received from these agencies.

2008

- U.S. Fish and Wildlife Service
- Natural Resource Conservation Service
- Montana Historical Society – State Historic Preservation Office

2004 and 2006 Correspondence

- U.S. Fish and Wildlife Service
- Montana Department of Fish, Wildlife, and Parks
- Montana Historical Society - State Historic Preservation Office
- U.S. Army Corps of Engineers
- Montana Department of Environmental Quality – Water Protection Bureau
- Montana Department of Environmental Quality – Air Quality Policy and Planning Section

2004 Correspondence

- National Institute of Allergy and Infectious Diseases, National Institutes of Health, Rocky Mountain Laboratories
- United States Department of Agriculture – Bitterroot National Forest
- Department of Natural Resources and Conservation
- Department of State Lands – Southwestern Land Office
- NorthWestern Energy
- Ravalli County Economic Development Authority
- Ravalli County Agricultural & Horticultural Information
- Ravalli County Road Department
- Ravalli County Planning Department
- Bitterroot Valley Chamber of Commerce
- City of Hamilton
- Bitterroot Disposal
- Ravalli County Sheriff
- City of Hamilton Police
- Ravalli County Commissioners



United States Department of the Interior

FISH AND WILDLIFE SERVICE
ECOLOGICAL SERVICES
MONTANA FIELD OFFICE
585 SHEPARD WAY
HELENA, MONTANA 59601
PHONE (406) 449-5225, FAX (406) 449-5339

File: M.29(I)

July 17, 2008

John W. Styba
U.S. Department of Transportation Federal Aviation Administration
Helena Airports District Office
FAA Building, Suite 2, 2725 Skyway Drive
Helena, Montana 59601

Dear Mr. Styba:

This letter responds to your June 14, 2008 request that the U.S. Fish and Wildlife Service (Service) review the Ravalli County Airport Development draft Environmental Assessment (EA). These comments have been prepared under the authority of, and in accordance with, the provisions of the Endangered Species Act of 1973, as amended (Act) (16 U.S.C. 1531 *et seq.*).

The Service does not agree with your determination of no effect for the threatened bull trout (*Salvelinus confluentes*) based on the information you provided. As indicated in Appendix VII, bull trout are known to occur upstream (2.1 miles) of the project area and may occur incidentally in the general area. The Service agrees that the potential for bull trout presence during construction activities is low and that the portion of Grid Creek that lies in the project area functions primarily as a migratory corridor for bull trout. In these instances the Service is primarily concerned with providing fish passage at a range of flows. Therefore the Service recommends that the proposed action provide for fish passage at the Grid Creek crossing(s). When considering fish passage structures, the Service supports the use of natural stream channel design techniques (see <http://www.fws.gov/mountain-prairie/pfw/r6pfw2h16.htm>). Generally, these types of structures use bankfull width plus 10 percent to provide for flow complexity within the structure.

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The EA indicates that between 0.06 to 1.96 acres of riparian habitat would be removed as a result of the proposed action. The Service recommends that the proposed action include mitigation in the form of improving/creating a commensurate riparian acreage. A review of aerial photos shows that portions of Grid Creek near and in the project area have been simplified/straightened over time. These straightened sections of Grid Creek have likely resulted in reducing the function of the aquatic and riparian habitats that would otherwise provide for fish and wildlife. Riparian habitat alterations contribute to widespread declines of inland native fishes and often favor exotic species. In order to mitigate for the loss of riparian acreages, the Service recommends restoring the natural stream channel, pattern, dimension, and profile to Grid Creek under Ravalli County Airport ownership.


The Service acknowledges your no effect determinations for the threatened Canada lynx (*Lynx canadensis*), gray wolf (*Canis lupus*) and bald eagle (*Haliaeetus leucocephalus*). Note that the gray wolf and bald eagle were removed from the list of threatened and endangered species. However, prohibitions from taking bald eagles are addressed under the Bald and Golden Eagle Act (BGEPA) and the Migratory Bird Treaty Act (MBTA). The MBTA and BGEPA prohibit the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests, except when specifically authorized by the Department of the Interior.

Bald eagles nest, winter and migrate within your planning area. Impacts to bald eagles in Montana can be avoided by following guidelines in the Montana Bald Eagle Management Plan - July 1994. On July 9, 2007, the final rule removing the bald eagle in the lower 48 states from the list of endangered and threatened wildlife (72 FR 37346) was published. Delisting was effective August 8, 2007. Bald eagles will continue to be protected by the BGEPA and the MBTA. On June 5, 2007, the Service announced a final definition of "disturb," (72 FR 31132), notice of availability for the final National Bald Eagle Management Guidelines (72 FR 31156), and a proposed regulation, that if finalized, would establish a permit process to allow a limited amount of "take" consistent with the preservation of bald and golden eagles (72 FR 31141). However, until such a regulation is finalized, the Service does not have any authority to authorize "take" other than what currently exists in 50 CFR 22 (e.g., scientific, educational or religious purpose). Individual bald eagles are still protected from certain effects that are likely to occur as the result of various human activities, including some habitat manipulation. Activities that disrupt eagles at nests, foraging areas, and important roosts can wound, kill, or disturb eagles, all of which are prohibited by the BGEPA. Through promulgation of the regulatory definition of "disturb" and issuance of the National Bald Eagle Management Guidelines, we have clarified that eagle nests, important foraging areas, and communal roost sites are afforded protection under the BGEPA to the degree that adjacent habitat modification would disturb, injure, or kill eagles.

The term "disturb" under the BGEPA has recently been defined as: "to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available, 1) injury to an eagle, 2) a decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior, or 3) nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior (72 FR 31332)."

We appreciate your efforts to ensure the conservation of threatened and endangered species as part of our joint responsibilities under the Endangered Species Act, as amended. If you have questions or comments related to this correspondence, please contact Dan Brewer of my staff at (406)-329-3951.

Sincerely,


for
R. Mark Wilson
Field Supervisor

cc: FWP, Hamilton, MT (Attn: Chris Clancy)



U.S. Department
of Transportation

Federal Aviation
Administration

Northwest Mountain Region
Colorado, Idaho, Montana
Oregon, Utah, Washington,
Wyoming

Helena Airports District Office
FAA Building, Suite 2
2725 Skyway Drive
Helena, MT 59601

Phone 406-449-5279
FAX 406-449-5274

June 26, 2008

U.S. Fish and Wildlife Service
Montana Ecological Services Field Office
R. Mark Wilson, Field Supervisor
585 Shepard Way
Helena, MT 59601

Dear Mr. Wilson:

Enclosed is a letter dated April 14, 2008 that we sent to your former address regarding a request for comments from your office on the Biotic Communities Section of the draft Environmental Assessment (EA) for proposed development at the Ravalli County Airport, Hamilton, Montana. In particular, we are interested in your comments with regard to bull trout that are present in sections of Grid Creek that runs through the proposed project area.

We only recently discovered the error in the address and confirmed the letter and its enclosures had not been received by your office after our discussion yesterday with Katrina Dixon.

Since 2004, there have been two letters sent and two letters of reply received from your office related to the on-going draft EA. Your earlier suggestion that we contact the fisheries division of the Montana Fish, Wildlife, and Parks (FWP), resulted in the bull trout listing in Grid Creek. According to the enclosed correspondence, habitats for the bull trout exist in the upper section of Grid Creek. A section of the water way was electro-shocked. The results of the test supported the statements made.

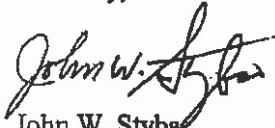
Included in the enclosed correspondence is a memorandum dated 3-14-05 by the Morrison-Majerle (Sponsor's Consultant that is preparing the EA) – that memo is a record of a call to Chris Clancy, fisheries biologist with FWP. We agree with the recommendation contained in that memorandum to have a culvert installed (under the proposed relocated runway) to allow fish passage through Grid Creek and that the culvert be installed such as to maintain the same stream gradient as the existing conditions.

We are approaching the final stages of the draft EA and hope to have the material ready for public viewing and comments later this summer. We feel it is important to have your office review and comment on the latest version of the Biotic Communities Section of the draft that includes discussions on threatened and endangered species.

We will include any comments you send in the draft EA. Once the draft is ready for public review and comment, copies will be available in the Ravalli County area, here, and with the Sponsor's Consultant who also is planning to have the draft available on the internet through a link on the County's web site (web address will be advertised). That web link will also be provided to public agencies, like your office, as soon as it becomes active.

Please call us at 406-449-5279 if you have any questions.

Sincerely,



John W. Styba
Civil Engineer

Enclosures:

1. Our 4-14-08 Letter of attempt to USFWS (address was in error), including Biotic Communities Section.
2. Project Sketches from the draft EA showing the preferred alternative with respect to Grid Creek.



U.S. Department
of Transportation

Federal Aviation
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Northwest Mountain Region
Colorado, Idaho, Montana
Oregon, Utah, Washington,
Wyoming

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2725 Skyway Drive
Helena, MT 59601

Phone 406-448-5279
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April 14, 2008

U.S. Fish and Wildlife Service
Montana Ecological Services Field Office
R. Mark Wilson, Field Supervisor
100 North Park, Suite 320
Helena, MT 59601

Dear Mr. Wilson:

The purpose of this letter is to request your written comments on the section of the draft Environmental Assessment (EA) for the proposed development at Ravalli County Airport, Hamilton, Montana.

Enclosed is a copy of the Biotic Communities Section of the draft EA, including discussion on Endangered and Threatened Species. Included in the enclosed, are copies of past correspondence between the Owner of Ravalli County Airport (Sponsor), their Consultant, Morrison-Maierle, Inc. (MM), U.S. Fish and Wildlife Service (FWS), and Montana Department of Fish, Wildlife, and Parks (FWP) with regard to the on-going EA.

The correspondence includes:

- Two letters to your office dated 8-4-04 (transmitting the draft EA) and 5-23-06 (transmitting the revised preliminary draft EA) from MM,
- Two reply letters from your office to MM dated 8-10-04 and 6-13-06,
- Letter from MM to FWP's Region 2 Headquarters in Missoula dated 8-4-04 (transmitting the draft EA),
- Letter of reply from FWP's Region 2 Supervisor dated 8-26-04, with concerns of impact to Gird Creek and need to contact FWP's Bitterroot fisheries biologist, Chris Clancy,
- Letter of reply from FWP's Region 2 Supervisor dated 12-20-04, commenting on the draft EA and suggesting a stream survey be conducted with respect to Gird Creek. This was to support the conclusion that "bull trout are not likely to reside in the reach of Gird Creek associated with this project".
- Memo to the files of a call from MM to FWP's fisheries biologist, Chris Clancy, dated 3-14-05. The memo includes a statement from FWP's Chris Clancy that a fisheries survey was done on 3/10/05.
- E-mail copy of message sent from MM to FWP's Chris Clancy on 4-11-05, requesting a short summary of the fisheries survey that was conducted Gird Creek,

and the 4-12-05 e-mail reply from Clancy to MM on the results of an electro fishing of 300' of the two channels of Gird Creek in the vicinity of the proposed development on 3-10-05,

- Letter from MM to FWP's Chris Clancy, fisheries biologist, dated 5-23-06, transmitting the revised preliminary draft of the EA,
- Letter from MM to FWP's John Vore, Wildlife Biologist, dated 5-23-06, transmitting the revised preliminary draft of the EA,

The reply letter from your office to MM, dated 8-10-04, included a table listing threatened, proposed habitat, candidate, or nonessential experimental species that may be present in the action area. This included the threatened / proposed critical habitat of the species bull trout, including the expected occurrence / range description: "cold water streams and lakes; found in the Bitterroot subbasin, including Camp Creek". This letter also stated that there may be State species of concern in the vicinity of the project and recommended contacting the Montana FWP.

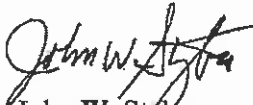
The correspondence with the FWP identified bull trout as existing in the upper reaches of Gird Creek, but not in the lower section of this waterway due to a lack of habitat that the bull trout prefer. The lower section of Gird Creek flows through the proposed project impact area as shown in the enclosed sketch of the preferred alternative taken from the draft EA. A recommendation by FWP was for a fisheries survey be conducted on Gird Creek – this was done on 3-10-05. The results of that survey backed up the statement that the lower section of Gird Creek lacked the habitat to support bull trout.

We have reviewed the section of the draft EA that discusses the biotic communities, including the threatened and endangered species. We agree with the recommendation contained in the above referenced memo dated 3-14-05 that a culvert be installed to allow fish passage through Gird Creek and that the culvert be installed such as to maintain the same stream gradient as the existing conditions.

We ask for your comments in regard to the statements made in the enclosed section of the draft EA relative to bull trout and the potential for the proposed project to impact this threatened species.

Please call us at 406-449-5279 if you have any questions.

Sincerely,



John W. Styba
Civil Engineer

Enclosures:

- (1) Biotic Communities Section of the draft EA, including discussion on Endangered and Threatened Species.
- (2) Project Sketch from the draft EA showing the preferred alternative.

Travis Eickman - Fwd: RE: Ravalli County Airport Farmland Conversion

From: Erik Nyquist
To: Eickman, Travis
Date: 3/4/2008 2:58 PM
Subject: Fwd: RE: Ravalli County Airport Farmland Conversion
CC: McGuire, Paul
Attachments: McGuire, Paul

Travis,

This is the email that Neal Svendsen sent after he completed NRCS's portion of the farmland conversion form. It is the only correspondence regarding the farmland conversion form for this project.

Erik

>>> "Svendsen, Neal - Missoula, MT" <Neal.Svendsen@mt.usda.gov> 2/26/2008 10:14 AM >>>
 Erik,

Attached AD-1006 for Ravalli Airport project. Thanks for your patience. We had to do some GIS work to get some acreages as the old soil survey is in the process of being updated. So the data includes old soil map units and new ones. It was a bit complicated.

By the way, where did you get this AD-1006? I haven't been able to find one that was properly fillable but this one is.

Neal

From: Erik Nyquist [mailto:enyquist@m-m.net]
Sent: Wednesday, February 20, 2008 5:37 PM
To: Svendsen, Neal - Missoula, MT
Cc: Paul McGuire; Travis Eickman
Subject: RE: Ravalli County Airport Farmland Conversion

Neal,

Thanks for the update. I will let you know if next week will be a problem.

thanks
 Erik

>>> "Svendsen, Neal - Missoula, MT" <Neal.Svendsen@mt.usda.gov> 2/20/2008 5:31 PM >>>
 Eric,

We are in the process of updating the Bitterroot Valley Area soil survey. Because of how our databases are set up it's going to take me a bit longer to figure some of the acreages I need to complete the AD-1006. I hope to be able to do it next week. If this is a problem let me know and I'll just make some estimates.

Neal

From: Erik Nyquist [mailto:enyquist@m-m.net]
Sent: Friday, February 15, 2008 3:42 PM
To: Svendsen, Neal - Missoula, MT

Cc: Paul McGuire; Travis Eickman
Subject: RE: Ravalli County Airport Farmland Conversion

Thanks Neal. Let me know if you need anything else.
Erik

>>> "Svendsen, Neal - Missoula, MT" <Neal.Svendsen@mt.usda.gov> 2/15/2008 3:37 PM >>>
Eric,

Received the materials. Should be able to process early next week.

Neal

From: Erik Nyquist [mailto:enyquist@m-m.net]
Sent: Friday, February 15, 2008 3:13 PM
To: Svendsen, Neal - Missoula, MT
Cc: Paul McGuire; Travis Eickman
Subject: Ravalli County Airport Farmland Conversion

Neal,

Please find attached four files that contain the farmland conversion form, maps of the project area, impact quantifications to soil map units within the project area, and an impact figure. Also, here is the link to the digital soils data that was provided by NRCS ftp://soildatamart-export.sc.egov.usda.gov/export/e_674254/soil_mt645.zip The impact quants. file contains two categories of impacts. The first set of quantifications are indirect impacts and the second are direct impacts.

Please let me know if you need any more information or have any questions.

Thanks

Erik Nyquist
Environmental Scientist
Morrison-Maierle, Inc., Environmental Services Group
901 Technology Boulevard
PO Box 1113
Bozeman, MT 59771
Phone (406) 587-0721
Fax: (406) 587-1176
enyquist@m-m.net



Soil Map-Bitterroot Valley Area, Montana
(Revised County Airport)

FARMLAND CONVERSION IMPACT RATING

PART I (To be completed by Federal Agency)		Date Of Land Evaluation Request 2/15/08			
Name Of Project Ravalli County Airport		Federal Agency Involved Federal Aviation Administration			
Proposed Land Use Expansion of airport facility and runway		County And State Ravalli County, Montana			
PART II (To be completed by NRCS)		Date Request Received By NRCS 2/15/08			
Does the site contain prime, unique, statewide or local important farmland? (If no, the FPPA does not apply – do not complete additional parts of this form).		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Acres Irrigated 0	Average Farm Size 170
Major Crop(s) Spring Wheat for Productivity Index	Farmable Land In Govt. Jurisdiction Acres: 120,000 % 35	Amount Of Farmland As Defined in FPPA Acres: 109,352 % 32			
Name Of Land Evaluation System Used Bitterroot Valley Area Soil Survey	Name Of Local Site Assessment System None Available	Date Land Evaluation Returned By NRCS 2/26/08			
PART III (To be completed by Federal Agency)		Alternative Site Rating			
		Site A	Site B	Site C	Site D
A. Total Acres To Be Converted Directly		31.8			
B. Total Acres To Be Converted Indirectly		21.0			
C. Total Acres In Site		52.8	0.0	0.0	0.0
PART IV (To be completed by NRCS) Land Evaluation Information					
A. Total Acres Prime And Unique Farmland		0.0			
B. Total Acres Statewide And Local Important Farmland		42.5			
C. Percentage Of Farmland In County Or Local Govt. Unit To Be Converted		0.0			
D. Percentage Of Farmland In Govt. Jurisdiction With Same Or Higher Relative Value		79.0			
PART V (To be completed by NRCS) Land Evaluation Criterion Relative Value Of Farmland To Be Converted (Scale of 0 to 100 Points)		44	0	0	0
PART VI (To be completed by Federal Agency) Site Assessment Criteria (These criteria are explained in 7 CFR 658.5(b))		Maximum Points			
1. Area In Nonurban Use	15	11			
2. Perimeter In Nonurban Use	10	9			
3. Percent Of Site Being Farmed	20	15			
4. Protection Provided By State And Local Government	20	0			
5. Distance From Urban Builtup Area	15	10			
6. Distance To Urban Support Services	15	10			
7. Size Of Present Farm Unit Compared To Average	10	0			
8. Creation Of Nonfarmable Farmland	10	7			
9. Availability Of Farm Support Services	5	5			
10. On-Farm Investments	20	14			
11. Effects Of Conversion On Farm Support Services	10	8			
12. Compatibility With Existing Agricultural Use	10	8			
TOTAL SITE ASSESSMENT POINTS	160	97	0	0	0
PART VII (To be completed by Federal Agency)					
Relative Value Of Farmland (From Part V)		100	44	0	0
Total Site Assessment (From Part VI above or a local site assessment)		160	97	0	0
TOTAL POINTS (Total of above 2 lines)		260	141	0	0
Site Selected:	Date Of Selection	Was A Local Site Assessment Used? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>			

Reason For Selection:

Note: Farmable land acreage estimated.

STEPS IN THE PROCESSING THE FARMLAND AND CONVERSION IMPACT RATING FORM

Step 1 - Federal agencies involved in proposed projects that may convert farmland, as defined in the Farmland Protection Policy Act (FPPA) to nonagricultural uses, will initially complete Parts I and III of the form.

Step 2 - Originator will send copies A, B and C together with maps indicating locations of site(s), to the Natural Resources Conservation Service (NRCS) local field office and retain copy D for their files. (Note: NRCS has a field office in most counties in the U.S. The field office is usually located in the county seat. A list of field office locations are available from the NRCS State Conservationist in each state).

Step 3 - NRCS will, within 45 calendar days after receipt of form, make a determination as to whether the site(s) of the proposed project contains prime, unique, statewide or local important farmland.

Step 4 - In cases where farmland covered by the FPPA will be converted by the proposed project, NRCS field offices will complete Parts II, IV and V of the form.

Step 5 - NRCS will return copy A and B of the form to the Federal agency involved in the project. (Copy C will be retained for NRCS records).

Step 6 - The Federal agency involved in the proposed project will complete Parts VI and VII of the form.

Step 7 - The Federal agency involved in the proposed project will make a determination as to whether the proposed conversion is consistent with the FPPA and the agency's internal policies.

INSTRUCTIONS FOR COMPLETING THE FARMLAND CONVERSION IMPACT RATING FORM

Part I: In completing the "County And State" questions list all the local governments that are responsible for local land controls where site(s) are to be evaluated.

Part III: In completing item B (Total Acres To Be Converted Indirectly), include the following:

1. Acres not being directly converted but that would no longer be capable of being farmed after the conversion, because the conversion would restrict access to them.
2. Acres planned to receive services from an infrastructure project as indicated in the project justification (e.g. highways, utilities) that will cause a direct conversion.

Part VI: Do not complete Part VI if a local site assessment is used.

Assign the maximum points for each site assessment criterion as shown in § 658.5 (b) of CFR. In cases of corridor-type projects such as transportation, powerline and flood control, criteria #5 and #6 will not apply and will be weighed zero, however, criterion #8 will be weighed a maximum of 25 points, and criterion #11 a maximum of 25 points.

Individual Federal agencies at the national level, may assign relative weights among the 12 site assessment criteria other than those shown in the FPPA rule. In all cases where other weights are assigned relative adjustments must be made to maintain the maximum total weight points at 160.

In rating alternative sites, Federal agencies shall consider each of the criteria and assign points within the limits established in the FPPA rule. Sites most suitable for protection under these criteria will receive the highest total scores, and sites least suitable, the lowest scores.

Part VII: In computing the "Total Site Assessment Points" where a State or local site assessment is used and the total maximum number of points is other than 160, adjust the site assessment points to a base of 160. Example: if the Site Assessment maximum is 200 points, and alternative Site "A" is rated 180 points:

Total points assigned Site A = $\frac{180}{200} \times 160 = 144$ points for Site "A."

Maximum points possible 200

Site Assessment Scoring for the Twelve Factors Used in FPPA

The Site Assessment criteria used in the Farmland Protection Policy Act (FPPA) rule are designed to assess important factors other than the agricultural value of the land when determining which alternative sites should receive the highest level of protection from conversion to non agricultural uses.

Twelve factors are used for Site Assessment and ten factors for corridor-type sites. Each factor is listed in an outline form, without detailed definitions or guidelines to follow in the rating process. The purpose of this document is to expand the definitions of use of each of the twelve Site Assessment factors so that all persons can have a clear understanding as to what each factor is intended to evaluate and how points are assigned for given conditions.

In each of the 12 factors a number rating system is used to determine which sites deserve the most protection from conversion to non-farm uses. The higher the number value given to a proposed site, the more protection it will receive. The maximum scores are 10, 15 and 20 points, depending upon the relative importance of each particular question. If a question significantly relates to why a parcel of land should not be converted, the question has a maximum possible protection value of 20, whereas a question which does not have such a significant impact upon whether a site would be converted, would have fewer maximum points possible, for example 10.

The following guidelines should be used in rating the twelve Site Assessment criteria:

1. How much land is in non-urban use within a radius of 1.0 mile from where the project is intended?

More than 90 percent:	15 points
90-20 percent:	14 to 1 points
Less than 20 percent:	0 points

This factor is designed to evaluate the extent to which the area within one mile of the proposed site is non-urban area. For purposes of this rule, "non-urban" should include:

- Agricultural land (crop-fruit trees, nuts, oilseed)
- Range land
- Forest land
- Golf Courses
- Non paved parks and recreational areas
- Mining sites
- Farm Storage
- Lakes, ponds and other water bodies
- Rural roads, and through roads without houses or buildings
- Open space
- Wetlands
- Fish production
- Pasture or hayland

Urban uses include:

- Houses (other than farm houses)
- Apartment buildings
- Commercial buildings
- Industrial buildings
- Paved recreational areas (i.e. tennis courts)
- Streets in areas with 30 structures per 40 acres
- Gas stations

- Equipment, supply stores
- Off-farm storage
- Processing plants
- Shopping malls
- Utilities/Services
- Medical buildings

In rating this factor, an area one-mile from the outer edge of the proposed site should be outlined on a current photo; the areas that are urban should be outlined. For rural houses and other buildings with unknown sizes, use 1 and 1/3 acres per structure. For roads with houses on only one side, use one half of road for urban and one half for non-urban.

The purpose of this rating process is to insure that the most valuable and viable farmlands are protected from development projects sponsored by the Federal Government. With this goal in mind, factor S1 suggests that the more agricultural lands surrounding the parcel boundary in question, the more protection from development this site should receive. Accordingly, a site with a large quantity of non-urban land surrounding it will receive a greater number of points for protection from development. Thus, where more than 90 percent of the area around the proposed site (do not include the proposed site in this assessment) is non-urban, assign 15 points. Where 20 percent or less is non-urban, assign 0 points. Where the area lies between 20 and 90 percent non-urban, assign appropriate points from 14 to 1, as noted below.

Percent Non-Urban Land within 1 mile	Points
90 percent or greater	15
85 to 89 percent	14
80 to 84 percent	13
75 to 79 percent	12
70 to 74 percent	11
65 to 69 percent	10
60 to 64 percent	9
55 to 59 percent	8
50 to 54 percent	7
45 to 49 percent	6
40 to 44 percent	5
35 to 39 percent	4
30 to 34 percent	3
25 to 29 percent	2
21 to 24 percent	1
20 percent or less	0

2. How much of the perimeter of the site borders on land in non-urban use?

More than 90 percent:	10 points
90 to 20 percent:	9 to 1 point(s)
Less than 20 percent:	0 points

This factor is designed to evaluate the extent to which the land adjacent to the proposed site is non-urban use. Where factor #1 evaluates the general location of the proposed site, this factor evaluates the immediate perimeter of the site. The definition of urban and non-urban uses in factor #1 should be used for this factor.

In rating the second factor, measure the perimeter of the site that is in non-urban and urban use. Where more than 90 percent of the perimeter is in non-urban use, score this factor 10 points. Where less than 20 percent, assign 0 points. If a road is next to the perimeter, class the area according to the

use on the other side of the road for that area. Use 1 and 1/3 acre per structure if not otherwise known. Where 20 to 90 percent of the perimeter is non-urban, assign points as noted below:

Percentage of Perimeter Bordering Land	Points	
90 percent or greater	10	
82 to 89 percent	9	:
74 to 81 percent	8	:
65 to 73 percent	7	
58 to 65 percent	6	
50 to 57 percent	5	
42 to 49 percent	4	
34 to 41 percent	3	
27 to 33 percent	2	
21 to 26 percent	1	
20 percent or Less	0	

3. How much of the site has been farmed (managed for a scheduled harvest or timber activity) more than five of the last ten years?

More than 90 percent:	20 points
90 to 20 percent:	19 to 1 point(s)
Less than 20 percent:	0 points

This factor is designed to evaluate the extent to which the proposed conversion site has been used or managed for agricultural purposes in the past 10 years.

Land is being farmed when it is used or managed for food or fiber, to include timber products, fruit, nuts, grapes, grain, forage, oil seed, fish and meat, poultry and dairy products.

Land that has been left to grow up to native vegetation without management or harvest will be considered as abandoned and therefore not farmed. The proposed conversion site should be evaluated and rated according to the percent, of the site farmed.

If more than 90 percent of the site has been farmed 5 of the last 10 years score the site as follows:

Percentage of Site Farmed	Points
90 percent or greater	20
86 to 89 percent	19
82 to 85 percent	18
78 to 81 percent	17
74 to 77 percent	16
70 to 73 percent	15
66 to 69 percent	14
62 to 65 percent	13
58 to 61 percent	12
54 to 57 percent	11
50 to 53 percent	10
46 to 49 percent	9
42 to 45 percent	8
38 to 41 percent	7
35 to 37 percent	6
32 to 34 percent	5
29 to 31 percent	4
26 to 28 percent	3

23 to 25 percent	2
20 to 22 percent percent or Less	1
Less than 20 percent	0

4. Is the site subject to state or unit of local government policies or programs to protect farmland or covered by private programs to protect farmland?

Site is protected:	20 points
Site is not protected:	0 points

This factor is designed to evaluate the extent to which state and local government and private programs have made efforts to protect this site from conversion.

State and local policies and programs to protect farmland include:

State Policies and Programs to Protect Farmland

1. Tax Relief:

A. **Differential Assessment:** Agricultural lands are taxed on their agricultural use value, rather than at market value. As a result, farmers pay fewer taxes on their land, which helps keep them in business, and therefore helps to insure that the farmland will not be converted to nonagricultural uses.

1. **Preferential Assessment for Property Tax:** Landowners with parcels of land used for agriculture are given the privilege of differential assessment.
2. **Deferred Taxation for Property Tax:** Landowners are deterred from converting their land to nonfarm uses, because if they do so, they must pay back taxes at market value.
3. **Restrictive Agreement for Property Tax:** Landowners who want to receive Differential Assessment must agree to keep their land in - eligible use.

B. Income Tax Credits

Circuit Breaker Tax Credits: Authorize an eligible owner of farmland to apply some or all of the property taxes on his or her farmland and farm structures as a tax credit against the owner's state income tax.

C. Estate and Inheritance Tax Benefits

Farm Use Valuation for Death Tax: Exemption of state tax liability to eligible farm estates.

2. "Right to farm" laws:

Prohibits local governments from enacting laws which will place restrictions upon normally accepted farming practices, for example, the generation of noise, odor or dust.

3. Agricultural Districting:

Wherein farmers voluntarily organize districts of agricultural land to be legally recognized geographic areas. These farmers receive benefits, such as protection from annexation, in exchange for keeping land within the district for a given number of years.

4. Land Use Controls: Agricultural Zoning.

Types of Agricultural Zoning Ordinances include:

- A. Exclusive: In which the agricultural zone is restricted to only farm-related dwellings, with, for example, a minimum of 40 acres per dwelling unit.
- B. Non-Exclusive: In which non-farm dwellings are allowed, but the density remains low, such as 20 acres per dwelling unit.

Additional Zoning techniques include:

- A. Sliding Scale: This method looks at zoning according to the total size of the parcel owned. For example, the number of dwelling units per a given number of acres may change from county to county according to the existing land acreage to dwelling unit ratio of surrounding parcels of land within the specific area.
- B. Point System or Numerical Approach: Approaches land use permits on a case by case basis.

LESA: The LESA system (Land Evaluation-Site Assessment) is used as a tool to help assess options for land use on an evaluation of productivity weighed against commitment to urban development.
- C. Conditional Use: Based upon the evaluation on a case by case basis by the Board of Zoning Adjustment. Also may include the method of using special land use permits.

5. Development Rights:

- A. Purchase of Development Rights (PDR): Where development rights are purchased by Government action.

Buffer Zoning Districts: Buffer Zoning Districts are an example of land purchased by Government action. This land is included in zoning ordinances in order to preserve and protect agricultural lands from non-farm land uses encroaching upon them.
- B. Transfer of Development Rights (TDR): Development rights are transferable for use in other locations designated as receiving areas. TDR is considered a locally based action (not state), because it requires a voluntary decision on the part of the individual landowners.

6. Governor's Executive Order: Policy made by the Governor, stating the importance of agriculture, and the preservation of agricultural lands. The Governor orders the state agencies to avoid the unnecessary conversion of important farmland to nonagricultural uses.

7. Voluntary State Programs:

- A. California's Program of Restrictive Agreements and Differential Assessments: The California Land Conservation Act of 1965, commonly known as the Williamson Act, allows cities, counties and individual landowners to form agricultural preserves and enter into contracts for 10 or more years to insure that these parcels of land remain strictly for agricultural use. Since 1972 the Act has extended eligibility to recreational and open space lands such as scenic highway corridors, salt ponds and wildlife preserves. These contractually restricted lands may be taxed differentially for their real value. One hundred-acre districts constitute the minimum land size eligible.

Suggestion: An improved version of the Act would state that if the land is converted after the contract expires, the landowner must pay the difference in the taxes between market value for the land and the agricultural tax value which he or she had been

paying under the Act. This measure would help to insure that farmland would not be converted after the 10 year period ends.

- B. Maryland Agricultural Land Preservation Program: Agricultural landowners within agricultural districts have the opportunity to sell their development rights to the Maryland Land Preservation Foundation under the agreement that these landowners will not subdivide or develop their land for an initial period of five years. After five years the landowner may terminate the agreement with one year notice.

As is stated above under the California Williamson Act, the landowner should pay the back taxes on the property if he or she decides to convert the land after the contract expires, in order to discourage such conversions.

- C. Wisconsin Income Tax Incentive Program: The Wisconsin Farmland Preservation Program of December 1977 encourages local jurisdictions in Wisconsin to adopt agricultural preservation plans or exclusive agricultural district zoning ordinances in exchange for credit against state income tax and exemption from special utility assessment. Eligible candidates include local governments and landowners with at least 35 acres of land per dwelling unit in agricultural use and gross farm profits of at least \$6,000 per year, or \$18,000 over three years.

8. Mandatory State Programs:

- A. The Environmental Control Act in the state of Vermont was adopted in 1970 by the Vermont State Legislature. The Act established an environmental board with 9 members (appointed by the Governor) to implement a planning process and a permit system to screen most subdivisions and development proposals according to specific criteria stated in the law. The planning process consists of an interim and a final Land Capability and Development Plan, the latter of which acts as a policy plan to control development. The policies are written in order to:
- prevent air and water pollution;
 - protect scenic or natural beauty, historic sites and rare and irreplaceable natural areas; and
 - consider the impacts of growth and reduction of development on areas of primary agricultural soils.
- B. The California State Coastal Commission: In 1976 the Coastal Act was passed to establish a permanent Coastal Commission with permit and planning authority. The purpose of the Coastal Commission was and is to protect the sensitive coastal zone environment and its resources, while accommodating the social and economic needs of the state. The Commission has the power to regulate development in the coastal zones by issuing permits on a case by case basis until local agencies can develop their own coastal plans, which must be certified by the Coastal Commission.
- C. Hawaii's Program of State Zoning: In 1961, the Hawaii State Legislature established Act 187, the Land Use Law, to protect the farmland and the welfare of the local people of Hawaii by planning to avoid "unnecessary urbanization". The Law made all state lands into four districts: agricultural, conservation, rural and urban. The Governor appointed members to a State Land Use Commission, whose duties were to uphold the Law and form the boundaries of the four districts. In addition to state zoning, the Land Use Law introduced a program of Differential Assessment, wherein agricultural landowners paid taxes on their land for its agricultural use value, rather than its market value.
- D. The Oregon Land Use Act of 1973: This act established the Land Conservation and Development Commission (LCDC) to provide statewide planning goals and guidelines.

Under this Act, Oregon cities and counties are each required to draw up a comprehensive plan, consistent with statewide planning goals. Agricultural land preservation is high on the list of state goals to be followed locally.

If the proposed site is subject to or has used one or more of the above farmland protection programs or policies, score the site 20 points. If none of the above policies or programs apply to this site, score 0 points.

5. How close is the site to an urban built-up area?

The site is 2 miles or more from an urban built-up area	15 points
The site is more than 1 mile but less than 2 miles from an urban built-up area	10 points
The site is less than 1 mile from, but is not adjacent to an urban built-up area	5 points
The site is adjacent to an urban built-up area	0 points

This factor is designed to evaluate the extent to which the proposed site is located next to an existing urban area. The urban built-up area must be 2500 population. The measurement from the built-up area should be made from the point at which the density is 30 structures per 40 acres and with no open or non-urban land existing between the major built-up areas and this point. Suburbs adjacent to cities or urban built-up areas should be considered as part of that urban area..

For greater accuracy, use the following chart to determine how much protection the site should receive according to its distance from an urban area. See chart below:

Distance From Perimeter of Site to Urban Area	Points
More than 10,560 feet	15
9,860 to 10,559 feet	14
9,160 to 9,859 feet	13
8,460 to 9,159 feet	12
7,760 to 8,459 feet	11
7,060 to 7,759 feet	10
6,360 to 7,059 feet	9
5,660 to 6,359 feet	8
4,960 to 5,659 feet	7
4,260 to 4,959 feet	6
3,560 to 4,259 feet	5
2,860 to 3,559 feet	4
2,160 to 2,859 feet	3
1,460 to 2,159 feet	2
760 to 1,459 feet	1
Less than 760 feet (adjacent)	0

6. How close is the site to water lines, sewer lines and/or other local facilities and services whose capacities and design would promote nonagricultural use?

None of the services exist nearer than 3 miles from the site	15 points
Some of the services exist more than one but less than 3 miles from the site	10 points
All of the services exist within 1/2 mile of the site	0 points

This question determines how much infrastructure (water, sewer, etc.) is in place which could facilitate nonagricultural development. The fewer facilities in place, the more difficult it is to develop an area. Thus, if a proposed site is further away from these services (more than 3 miles distance away), the site should be awarded the highest number of points (15). As the distance of the parcel of land to services decreases, the number of points awarded declines as well. So, when the site is equal to or further than 1 mile but less than 3 miles away from services, it should be given 10 points. Accordingly, if this distance is 1/2 mile to less than 1 mile, award 5 points; and if the distance from land to services is less than 1/2 mile, award 0 points.

Distance to public facilities should be measured from the perimeter of the parcel in question to the nearest site(s) where necessary facilities are located. If there is more than one distance (i.e. from site to water and from site to sewer), use the average distance (add all distances and then divide by the number of different distances to get the average).

Facilities which could promote nonagricultural use include:

- Water lines
- Sewer lines
- Power lines
- Gas lines
- Circulation (roads)
- Fire and police protection
- Schools

7. **Is the farm unit(s) containing the site (before the project) as large as the average-size farming unit in the county? (Average farm sizes in each county are available from the NRCS field offices in each state. Data are from the latest available Census of Agriculture, Acreage of Farm Units in Operation with \$1,000 or more in sales.)**

As large or larger:	10 points
Below average: Deduct 1 point for each 5 percent below the average, down to 0 points if 50 percent or more is below average	9 to 0 points

This factor is designed to determine how much protection the site should receive, according to its size in relation to the average size of farming units within the county. The larger the parcel of land, the more agricultural use value the land possesses, and vice versa. Thus, if the farm unit is as large or larger than the county average, it receives the maximum number of points (10). The smaller the parcel of land compared to the county average, the fewer number of points given. Please see below:

Parcel Size in Relation to Average County Size	Points
Same size or larger than average (100 percent)	10
95 percent of average	9
90 percent of average	8
85 percent of average	7
80 percent of average	6
75 percent of average	5
70 percent of average	4
65 percent of average	3
60 percent of average	2
55 percent of average	1
50 percent or below county average	0

State and local Natural Resources Conservation Service offices will have the average farm size information, provided by the latest available Census of Agriculture data

8. If this site is chosen for the project, how much of the remaining land on the farm will become non-farmable because of interference with land patterns?

Acreage equal to more than 25 percent of acres directly converted by the project	10 points
Acreage equal to between 25 and 5 percent of the acres directly converted by the project	9 to 1 point(s)
Acreage equal to less than 5 percent of the acres directly converted by the project	0 points

This factor tackles the question of how the proposed development will affect the rest of the land on the farm. The site which deserves the most protection from conversion will receive the greatest number of points, and vice versa. For example, if the project is small, such as an extension on a house, the rest of the agricultural land would remain farmable, and thus a lower number of points is given to the site. Whereas if a large-scale highway is planned, a greater portion of the land (not including the site) will become non-farmable, since access to the farmland will be blocked; and thus, the site should receive the highest number of points (10) as protection from conversion.

Conversion uses of the Site Which Would Make the Rest of the Land Non-Farmable by Interfering with Land Patterns

Conversions which make the rest of the property nonfarmable include any development which blocks accessibility to the rest of the site. Examples are highways, railroads, dams or development along the front of a site restricting access to the rest of the property.

The point scoring is as follows:

Amount of Land Not Including the Site Which Will Become Non-Farmable	Points
25 percent or greater	10
23 - 24 percent	9
21 - 22 percent	8
19 - 20 percent	7
17 - 18 percent	6
15 - 16 percent	5
13 - 14 percent	4
11 - 12 percent	3
9 - 11 percent	2
6 - 8 percent	1
5 percent or less	0

9. Does the site have available adequate supply of farm support services and markets, i.e., farm suppliers, equipment dealers, processing and storage facilities and farmer's markets?

All required services are available	5 points
Some required services are available	4 to 1 point(s)
No required services are available	0 points

This factor is used to assess whether there are adequate support facilities, activities and industry to keep the farming business in business. The more support facilities available to the agricultural

landowner, the more feasible it is for him or her to stay in production. In addition, agricultural support facilities are compatible with farmland. This fact is important, because some land uses are not compatible; for example, development next to farmland can be dangerous to the welfare of the agricultural land, as a result of pressure from the neighbors who often do not appreciate the noise, smells and dust intrinsic to farmland. Thus, when all required agricultural support services are available, the maximum number of points (5) are awarded. When some services are available, 4 to 1 point(s) are awarded; and consequently, when no services are available, no points are given. See below:

Percent of Services Available	Points
100 percent	5
75 to 99 percent	4
50 to 74 percent	3
25 to 49 percent	2
1 to 24 percent	1
No services	0

10. Does the site have substantial and well-maintained on farm investments such as barns, other storage buildings, fruit trees and vines, field terraces, drainage, irrigation, waterways, or other soil and water conservation measures?

High amount of on-farm investment	20 points
Moderate amount of non-farm investment	19 to 1 point(s)
No on-farm investments	0 points

This factor assesses the quantity of agricultural facilities in place on the proposed site. If a significant agricultural infrastructure exists, the site should continue to be used for farming, and thus the parcel will receive the highest amount of points towards protection from conversion or development. If there is little on farm investment, the site will receive comparatively less protection. See-below:

Amount of On-farm Investment	Points
As much or more than necessary to maintain production (100 percent)	20
95 to 99 percent	19
90 to 94 percent	18
85 to 89 percent	17
80 to 84 percent	16
75 to 79 percent	15
70 to 74 percent	14
65 to 69 percent	13
60 to 64 percent	12
55 to 59 percent	11
50 to 54 percent	10
45 to 49 percent	9
40 to 44 percent	8
35 to 39 percent	7
30 to 34 percent	6
25 to 29 percent	5
20 to 24 percent	4
15 to 19 percent	3
10 to 14 percent	2
5 to 9 percent	1
0 to 4 percent	0

11. Would the project at this site, by converting farmland to nonagricultural use, reduce the support for farm support services so as to jeopardize the continued existence of these support services and thus, the viability of the farms remaining in the area?

Substantial reduction in demand for support services if the site is converted	10 points
Some reduction in demand for support services if the site is converted	9 to 1 point(s)
No significant reduction in demand for support services if the site is converted	0 points

This factor determines whether there are other agriculturally related activities, businesses or jobs dependent upon the working of the pre-converted site in order for the others to remain in production. The more people and farming activities relying upon this land, the more protection it should receive from conversion. Thus, if a substantial reduction in demand for support services were to occur as a result of conversions, the proposed site would receive a high score of 10; some reduction in demand would receive 9 to 1 point(s), and no significant reduction in demand would receive no points.

Specific points are outlined as follows:

Amount of Reduction in Support Services if Site Is Converted to Nonagricultural Use	Points
Substantial reduction (100 percent)	10
90 to 99 percent	9
80 to 89 percent	8
70 to 79 percent	7
60 to 69 percent	6
50 to 59 percent	5
40 to 49 percent	4
30 to 39 percent	3
20 to 29 percent	2
10 to 19 percent	1
No significant reduction (0 to 9 percent)	0

12. Is the kind and intensity of the proposed use of the site sufficiently incompatible with agriculture that it is likely to contribute to the eventual conversion of the surrounding farmland to nonagricultural use?

Proposed project is incompatible with existing agricultural use of surrounding farmland	10 points
Proposed project is tolerable of existing agricultural use of surrounding farmland	9 to 1 point(s)
Proposed project is fully compatible with existing agricultural use of surrounding farmland	0 points

Factor 12 determines whether conversion of the proposed agricultural site will eventually cause the conversion of neighboring farmland as a result of incompatibility of use of the first with the latter. The more incompatible the proposed conversion is with agriculture, the more protection this site receives from conversion. Therefore, if the proposed conversion is incompatible with agriculture, the site receives 10 points. If the project is tolerable with agriculture, it receives 9 to 1 points; and if the proposed conversion is compatible with agriculture, it receives 0 points.

CORRIDOR - TYPE SITE ASSESSMENT CRITERIA

The following criteria are to be used for projects that have a linear or corridor - type site configuration connecting two distant points, and crossing several different tracts of land. These include utility lines, highways, railroads, stream improvements, and flood control systems. Federal agencies are to assess the suitability of each corridor-type site or design alternative for protection as farmland along with the land evaluation information.

For Water and Waste Programs, corridor analyses are not applicable for distribution or collection networks. Analyses are applicable for transmission or trunk lines where placement of the lines are flexible.

(1) How much land is in nonurban use within a radius of 1.0 mile from where the project is intended?

- | | |
|--------------------------|-----------------------|
| (2) More than 90 percent | (3) 15 points |
| (4) 90 to 20 percent | (5) 14 to 1 point(s). |
| (6) Less than 20 percent | (7) 0 points |

(2) How much of the perimeter of the site borders on land in nonurban use?

- | | |
|--------------------------|-------------------|
| (3) More than 90 percent | (4) 10 point(s) |
| (5) 90 to 20 percent | (6) 9 to 1 points |
| (7) less than 20 percent | (8) 0 points |

(3) How much of the site has been farmed (managed for a scheduled harvest or timber activity) more than five of the last 10 years?

- | | |
|--------------------------|----------------------|
| (4) More than 90 percent | (5) 20 points |
| (6) 90 to 20 percent | (7) 19 to 1 point(s) |
| (8) Less than 20 percent | (9) 0 points |

(4) Is the site subject to state or unit of local government policies or programs to protect farmland or covered by private programs to protect farmland?

- | | |
|-----------------------|-----------|
| Site is protected | 20 points |
| Site is not protected | 0 points |

(5) Is the farm unit(s) containing the site (before the project) as large as the average - size farming unit in the County? (Average farm sizes in each county are available from the NRCS field offices in each state. Data are from the latest available Census of Agriculture, Acreage of Farm Units in Operation with \$1,000 or more in sales.)

- | | |
|---|---------------|
| As large or larger | 10 points |
| Below average deduct 1 point for each 5 percent below the average, down to 0 points if 50 percent or more below average | 9 to 0 points |

(6) If the site is chosen for the project, how much of the remaining land on the farm will become non-farmable because of interference with land patterns?

- | | |
|--|------------------|
| Acreage equal to more than 25 percent of acres directly converted by the project | 25 points |
| Acreage equal to between 25 and 5 percent of the acres directly converted by the project | 1 to 24 point(s) |
| Acreage equal to less than 5 percent of the acres directly converted by the project | 0 points |

- (7) Does the site have available adequate supply of farm support services and markets, i.e., farm suppliers, equipment dealers, processing and storage facilities and farmer's markets?

All required services are available	5 points
Some required services are available	4 to 1 point(s)
No required services are available	0 points

- (8) Does the site have substantial and well-maintained on-farm investments such as barns, other storage building, fruit trees and vines, field terraces, drainage, irrigation, waterways, or other soil and water conservation measures?

High amount of on-farm investment	20 points
Moderate amount of on-farm investment	19 to 1 point(s)
No on-farm investment	0 points

- (9) Would the project at this site, by converting farmland to nonagricultural use, reduce the demand for farm support services so as to jeopardize the continued existence of these support services and thus, the viability of the farms remaining in the area?

Substantial reduction in demand for support services if the site is converted	25 points
Some reduction in demand for support services if the site is converted	1 to 24 point(s)
No significant reduction in demand for support services if the site is converted	0 points

- (10) Is the kind and intensity of the proposed use of the site sufficiently incompatible with agriculture that it is likely to contribute to the eventual conversion of surrounding farmland to nonagricultural use?

Proposed project is incompatible to existing agricultural use of surrounding farmland	10 points
Proposed project is tolerable to existing agricultural use of surrounding farmland	9 to 1 point(s)
Proposed project is fully compatible with existing agricultural use of surrounding farmland	0 points



U. S Department
of Transportation

Federal Aviation
Administration

Memorandum

AIRPORTS DISTRICT OFFICE
FAA Building, Suite 2
2725 Skyway Drive
Helena, MT 59602

Subject: Final Mitigation Report for Eligible Historic Hangars
Future Follow Up Mitigation Measures
Ravalli County Airport, Hamilton, Montana

Date 3-06-08

From: Civil Engineer
Helena Airports District Office, HLN-620

Reply to Styba
Attn of: 406-449-5279

To Files: Hamilton Environmental

The draft Environmental Assessment (EA) for the relocation and extension of Runway 16/34 at Ravalli County Airport, Hamilton, Montana, contains a final mitigation report, dated May 2006, for two historic hangars impacted by the preferred alternative of the proposed project.

A copy of the report contained in the draft EA was sent to the State Historic Preservation Office (SHPO) on 2-26-08 (see attached letter), stating that FAA concurs with the report and requests SHPO's review and comments. We received SHPO's response dated 3-3-08 (copy attached). The letter from SHPO states that they concur with the two mitigation tracks presented in the report as acceptable mitigation options for the two hangars. Also noted in SHPO's letter, is the need to perform a structural assessment of these buildings.

The structural assessment is needed to determine if the buildings are capable of being moved. Page 15 of the mitigation report states that there are two critical early steps with regard to relocating the historic hangars: first, the sponsor must purchase the hangars and land they are on; second, the hangars need to be structurally assessed to determine if they are capable of being relocated. The current owner, Daly Ditch Company, has converted these hangars to office space – some of the modifications done for office use may need to be removed to complete the structural evaluation, thus the need to first purchase, and then conduct the evaluation.

Approval of the environmental process, for the proposed project, by FAA will be contingent upon the mitigation of resulting environmental impacts, including impacts to the historic hangars. The decision, on which mitigation track will be taken on these hangars, will be coordinated with SHPO following the completion of the structural assessment which would occur in the first phase of any follow on development (land acquisition phase would be the first follow on development).

John Styba, HLN-620
Civil Engineer
Attachments



MONTANA HISTORICAL SOCIETY

225 North Roberts ♦ P.O. Box 201201 ♦ Helena, MT 59620-1201
♦ (406) 441-2694 ♦ FAX (406) 441-2696 ♦ www.montanahistoricalsociety.org ♦

March 3, 2008

Mr. John Styba
Civil Engineer
Federal Aviation Administration
Airport District Office
FAA Building, Suite 2
2725 Skyway Drive
Helena, MT 59602

RECEIVED

MAR 5 2008

HLN/ADO

Ref: Hamilton Airport Final Mitigation Report

Dear John:

I reviewed our database for this project and see a note reflecting verbal correspondence I had with either you or MPA, and a note showing that since it was in its draft form, the report was unresolved. In my draft copy of the report I see post-its with some notes, but mostly regarding clarity of what is written and nothing contrary to what the draft proposes.

I recall MPA discussing the two mitigation tracks with me as they wrote the plan and I concur that these are acceptable mitigation options for the two hangars. It remains to be seen which building follows which track. I guess the next step would be performing a structural assessment to determine what is physically possible for these buildings.

We look forward to seeing the Environmental Assessment for this project.

Sincerely,


Pete Brown
Historic Architecture Specialist

File: FAA-Hamilton Airport-2008022704



STATE HISTORIC PRESERVATION OFFICE ♦ (406) 441-2694 ♦ P.O. Box 201202 ♦ Helena, MT 59620-1202

♦ (406) 441-2695 ♦ FAX (406) 441-2696 ♦ www.montanahistoricalsociety.org/shpo ♦



U. S. Department
of Transportation

Federal Aviation
Administration

February 26, 2008

State Historic Preservation Office
Attn: Pete Brown
P.O. Box 201202
Helena, MT 59601

AIRPORTS DISTRICT OFFICE
FAA Building, Suite 2
2725 Skyway Drive
Helena, MT 59602

Re: Request for Agency Comments
Ravalli County Airport
Environmental Assessment of
Proposed Improvements
SHPO Project #2004080503

Dear Mr. Pete Brown:

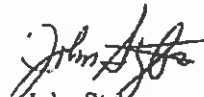
On February 10, 2006 the Montana Preservation Alliance forwarded their draft mitigation report for the proposed improvements addressed in the Ravalli County Airport Environmental Assessment to Morrison-Maierle, Inc., SHPO, and the Ravalli County Airport. There is no record of any follow up correspondence from SHPO concerning their concurrence/non-concurrence with the contents of the report.

The last correspondence received from SHPO was dated August 31, 2004. That letter addressed the eligibility of the Daly Ditch Irrigation District Buildings, formerly hangars owned by Hayward Flying Service. The FAA agrees that the hangars are culturally significant and concur in your determination of eligibility.

Enclosed, please find a copy of the Cultural Resources Mitigation Plan for Two Historic Hangars that is to be included in an appendix of the Environmental Assessment (EA). Please review the plan and provide your concurrence or comments for inclusion in the EA.

If you require any additional information, or have questions, please feel free to contact me at (406) 449-5279.

Sincerely,


John Styka
Civil Engineer

Enclosure



901 TECHNOLOGY BLVD • P.O. BOX 1113 • BOZEMAN, MT 59711 • 406-587-0721 • FAX: 406-587-1178

0877.008
Job Book 4:26

ENGINEERS
SCIENTISTS
SURVEYORS
PLANNERS

May 23, 2006

FILE COPY

U.S. Fish and Wildlife Service
Montana Ecological Services Field Office
R. Mark Wilson, Field Supervisor
100 North Park, Suite 320
Helena, MT 59601

Subject: Ravalli County Airport – Transmittal of Draft Environmental Assessment and Request for Review
MMI#: 0877.008

Dear Mr. Wilson:

Please find enclosed one copy of the revised preliminary draft Environmental Assessment (EA) for the proposed development and improvement project at the Ravalli County Airport. The project site is located approximately 1 mile east of Hamilton, Montana in Sections 20 and 29 of Township 6 North, Range 20 West, P.M.M., Ravalli County, Montana. The Federal Aviation Administration – Helena Airports District Office (FAA Helena) has requested comprehensive federal/state agency review of the revised draft EA that was completed by Monger and Associates, LLC and Morrison-Maierle, Inc. in May 2006. We are requesting a review from the U.S. Fish and Wildlife Service of this draft EA for potential environmental impacts to threatened and endangered species and critical habitat.

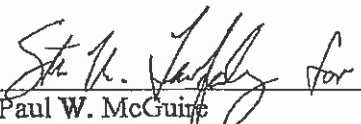
The enclosed draft EA document addresses the proposed development and improvement project for the Ravalli County Airport. This draft EA is intended to identify and address potential impacts associated with the proposed project development activities. The airport is currently accommodating aircraft that exceed the operation design limitations of the existing facilities, which has resulted in the need for the proposed development and improvement project. The purpose of the proposed airport development is to bring the airport into compliance with federal standards and to enhance the safety of persons in aircraft and on the ground. Four development alternatives were identified in this draft EA: 1) No Action, 2) Widen Existing Runway, 3) Relocate Runway 240 Feet East, and 4) Relocate Runway 400 Feet East. The draft EA document has identified Alternative Four as the preferred alternative due to increased runway length and safety, increased distance from present and future structures, and the provision of additional space for future expansion, if needed.

"Providing resources in partnership with clients to achieve their goals"

At your earliest convenience, please review this draft EA document for potential environmental impacts to threatened and endangered species and critical habitat resulting from proposed project activities. Following your review of this draft EA, your comments will be reviewed for incorporation into a final draft EA document that will be submitted to FAA Helena and made available for public comment.

Thank you for your time and review of the enclosed document. If you have any questions or comments regarding the information provided, please call me at (406) 587-0721.

Sincerely,
Morrison-Maierle, Inc.


Paul W. McGuire
Senior Environmental Scientist

PWM/TCT

Enclosure

cc:	Scott Bell, MMI	1/0
	John Styba, FAA Helena	1/0
	Glenda Wiles, Ravalli County Commissioners	1/0

RECEIVED JUN 19 2006



United States Department of the Interior

FISH AND WILDLIFE SERVICE

ECOLOGICAL SERVICES
MONTANA FIELD OFFICE
585 SHEPARD WAY

HELENA, MONTANA 59601
PHONE (406) 449-5225, FAX (406) 449-5339

File: M14 FAA (I)

June 13, 2006

Paul W. McGuire
Morrison Maierle, Inc
901 Technology Blvd.
P.O. Box 1113
Bozeman, Montana 59771

Dear Mr. McGuire:

This is in response to your request dated May 23, 2006 for U.S. Fish and Wildlife Service (Service) review and comments regarding the proposed development and improvement project at the Ravalli County Airport near Hamilton, Montana. We appreciate the opportunity to review this proposal and provide comments. These comments have been prepared under the authority of and in accordance with the provisions of the Fish and Wildlife Coordination Act (16 U.S.C. 661 et. seq.) and the Endangered Species Act (16 U.S.C. 1531 et. seq.).

The Ravalli County Airport is located in an area where the threatened bald eagle (*Haliaeetus leucocephalus*) may occur. A bald eagle nest does occur in section 19 of Township 6N, Range 20W. This is within the home range of a typical bald eagle. We suggest that the guidance within the Montana Bald Eagle Management Plan July 1994 be followed in regards to nest site management zones. This information can be found on our website at: http://montanafieldoffice.fws.gov/Endangered_Species/Recovery_and_Mgmt_Plans/Montana_Bald_Eagle_mgmt_plan.pdf, pages 21-25. Listed species are protected under the Endangered Species Act and we recommend when planning proposed activities that impacts to the bald eagle be considered.

The Service also has concerns regarding other wildlife, including migratory birds. Most airplane strikes with wildlife occur on or near airport property. Wetlands, grain fields and river corridors are a combination likely to be attractive to many species of wildlife. If the sites proposed for future development are in or near these types of habitat, we recommend the project be designed to avoid and minimize impacts to wildlife by lowering the risks of strike hazards to the extent possible. The presence of food and garbage are also attractants to wildlife. Feeding wildlife on airport property should be avoided and garbage and trash containers should be properly secured.

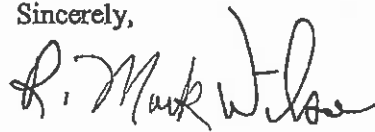
The Service does not have any site-specific information on other species of fish or wildlife that may occur in the proposed project area. There may be state species of concern in the vicinity of the project and we recommend contacting the Montana Department of Fish, Wildlife and Parks

at 1420 East Sixth Ave., P.O. Box 200701, Helena, MT 59620-0701, 406-444-2535 or the Montana Natural Heritage Program, 1515 East 6th Avenue, Box 201800, Helena, MT 59620-1800, 406-444-5354.

If wetlands are impacted by this project, Corps of Engineers Section 404 permits may be required. The Service suggests any proposed or future project be designed to avoid and minimize impacts to wetland areas, stream channels and surrounding vegetation to the greatest extent possible. Direct, indirect and cumulative impacts, along with future activities required to maintain these improvements, should be analyzed.

The Service appreciates your efforts to incorporate fish and wildlife resource concerns into your project planning. If you have questions or comments related to this issue, please contact Katrina Dixon at 406-449-5225 extension 222.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Mark Wilson". The signature is fluid and cursive, with the first name "R." and last name "Wilson" clearly distinguishable.

R. Mark Wilson
Field Supervisor



United States Department of the Interior

FISH AND WILDLIFE SERVICE

ECOLOGICAL SERVICES
MONTANA FIELD OFFICE
100 N. PARK, SUITE 320
HELENA, MONTANA 59601
PHONE (406) 449-5225, FAX (406) 449-5339

File: M.14 FAA (I)

August 10, 2004

Scott T. Bell, P.E.
Morrison Maierle, Inc.
P.O. Box 1113
Bozeman, Montana 59771

Dear Mr. Bell:

This is in response to your August 4, 2004 request, received in this office August 5, 2004, for information from the U.S. Fish and Wildlife Service (Service) on federally listed and endangered species which may occur in the vicinity of the proposed improvement project area for the Ravalli County airport, located one mile east of Hamilton, Montana.

In accordance with section 7(c) of the Act, the Service has determined that the following listed species may be present in the action area:

<i>Species</i>	<i>Status</i>	<i>Expected occurrence/Range</i>
Canada Lynx (<i>Lynx canadensis</i>)	threatened	Resident; Western Montana - montane spruce/fir forest
Bull Trout (<i>Salvelinus confluentus</i>)	threatened/proposed critical habitat	cold water streams and lakes; found in the Bitterroot subbasin, including Camp Creek
Bald Eagle (<i>Haliaeetus leucocephalus</i>)	threatened	Resident year-long, spring/fall migrant, nesting; Forested riparian, statewide
Gray Wolf (<i>Canis lupus</i>)	nonessential experimental	Resident, transient; forests, Western Montana
Yellow-billed cuckoo, western population (<i>Coccyzus americanus</i>)	candidate	Population west of the Continental Divide; riparian areas with cottonwoods and willows

The Service is providing this information to assist you in determining possible impacts to species of federal concern. There may be state species of concern in the vicinity of the project and we recommend contacting Montana Fish, Wildlife and Parks at 1420 East Sixth Avenue, P.O. Box 200701, Helena, Montana 59620-0701, 406-444-2535 or the Montana Natural Heritage Program, 1515 East Sixth Avenue, P.O. Box 201800, Helena, Montana 59620-1800, 406-444-5354.

On November 22, 1994, the Service approved a plan to establish nonessential experimental populations of wolves in Yellowstone National Park and central Idaho. Rules published in the *Federal Register* designate gray wolves in each area as nonessential experimental populations under section 10(j) of the Act. Within the designated nonessential experimental population areas described and depicted in the rules, all gray wolves will be managed in accordance with the provisions outlined in the rules, which include the following:

- a) For section 7 consultation purposes wolves designated as nonessential experimental that are within the boundaries of any unit of the National Park or National Wildlife Refuge systems are treated as a threatened species. As such, the section 7 procedures for listed species would apply to federal actions within National Parks and National Wildlife Refuges.
- b) Wolves designated as nonessential experimental that are not within units of the National Park or National Wildlife Refuge systems but are within the boundaries of the nonessential experimental population area are treated as proposed species for section 7 purposes. As such, federal agencies are only required to confer with the Service when they determine that an action they authorize fund or carry out "is likely to jeopardize the continued existence" of the species.
- c) Wolves occurring outside the central Idaho and Yellowstone nonessential experimental population areas retain their threatened status.

The proposed project areas occur within both the central Idaho and Yellowstone nonessential experimental population areas, as well as outside of both experimental areas. The central Idaho experimental population area includes portions of Idaho south of Interstate 90 and west of Interstate 15. It also includes a corner of Montana south of Interstate 90, east of Highway 93 as it runs south of Missoula, south of Highway 12 to Lolo pass, and west of Interstate 15. The experimental population area for the Yellowstone region includes the entire State of Wyoming, a portion of southeastern Idaho east of Interstate 15, and a portion of Montana east of Interstate 15 and south of the Missouri River.

Section 7(c) of the Act requires federal agencies proposing major construction activities complete a biological assessment to determine the effects of the proposed actions on listed and proposed species. A major construction activity is defined as "a construction project (or other undertaking having similar physical impacts) which is a major federal action significantly affecting the quality of the human environment as referred to in the National Environmental Policy Act" (50 CFR Part 402). If a biological assessment is not required (i.e., all other actions), the federal agency is still required to review their proposed activities to determine whether listed species may be affected. If such a determination is made, formal consultation with the Service is required.

For those actions wherein a biological assessment is required, the assessment should be completed within 180 days of initiation. This time frame can be extended by mutual agreement between the federal agency or its designated non-federal representative and the Service. If an assessment is not initiated within 90 days, this list of threatened and endangered species should be verified with the Service prior to initiation of the assessment. The biological assessment may

be undertaken as part of the federal agency's compliance of section 102 of the NEPA and incorporated into the NEPA documents. We recommend that biological assessments include the following:

1. A description of the project.
2. A description of the specific area that may be affected by the action.
3. The current status, habitat use, and behavior of T/E species in the project area.
4. Discussion of the methods used to determine the information in Item 3.
5. An analysis of the affects of the action on listed species and proposed species and their habitats, including an analysis of any cumulative effects.
6. Coordination/mitigation measures that will reduce/eliminate adverse impacts to T/E species.
7. The expected status of T/E species in the future (short and long term) during and after project completion.
8. A determination of "May affect, likely to adversely affect" or "May affect, not likely to adversely affect" for listed species.
9. A determination of "is likely to jeopardize" or "is not likely to jeopardize" for proposed species.
10. Citation of literature and personal contacts used in developing the assessment.

If it is determined a proposed program or project "is likely to adversely affect" any listed species, formal consultation should be initiated with this office. If it is concluded the project "is not likely to adversely affect" listed species, the Service should be asked to review the assessment and concur with the determination of no adverse effect.

A federal agency may designate a non-federal representative to conduct informal consultation or prepare biological assessments. However, the ultimate responsibility for section 7 compliance remains with the federal agency and written notice should be provided to the Service upon such a designation. We recommend federal agencies provide their non-federal representatives with proper guidance and oversight during preparation of biological assessments and evaluation of potential impacts to listed species.

Section 7(d) of the Act requires that the federal agency and permit/license applicant shall not make any irreversible or irretrievable commitment of resources which would preclude the formulation of reasonable and prudent alternatives until consultation on listed species is completed.

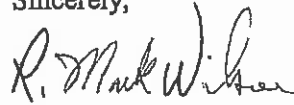
The Service does have concerns regarding other wildlife, including migratory birds. Most airplane strikes with wildlife occur on or near airport property. Wetlands, grain fields and river corridors are a combination likely to be attractive to many species of wildlife. If the sites proposed for construction of the runway extension and new taxiway are in or near these types of habitat, we recommend the project be designed to avoid and minimize impacts to wildlife by lowering the risks of strike hazards to the extent possible. The presence of food and garbage are also attractants to wildlife. Feeding wildlife on airport property should be avoided and garbage and trash containers should be properly secured.

There may also be some groundwater quality issues and concerns involved with this project. If the applicant has not done so already, the Service recommends contacting the Montana Department of Environmental Quality for permitting and technical expertise.

If wetlands may be impacted by this project, Corps of Engineers Section 404 permits may be required. The Service suggests the proposed project be designed to avoid and minimize impacts to any wetland areas, stream channels and surrounding vegetation to the greatest extent possible. Where feasible, minimize the area necessary for construction to reduce direct habitat impacts. The applicant should analyze direct, indirect and cumulative impacts along with future activities required to maintain these improvements.

The Service appreciates your efforts to incorporate fish and wildlife resource concerns into your project planning. If you have questions or comments related to this issue, please contact Sierra Harris at 406-449-5225, extension 202 or me at extension 205.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Mark Wilson". The signature is fluid and cursive, with the first name "R." and last name "Wilson" clearly distinguishable.

R. Mark Wilson
Field Supervisor



ENGINEERS
SCIENTISTS
SURVEYORS
PLANNERS
901 TECHNOLOGY BLVD • P.O. BOX 1113 • BOZEMAN, MT 59771 • 406-587-0721 • FAX: 406-587-1176

August 4, 2004

United States Department of the Interior, Fish and Wildlife Service
Montana Field Office
100 N. Park, Suite 320
Helena, MT 59601

Re: Request for Agency Comments
Ravalli County Airport Environmental Assessment of Proposed Improvements

The Board of Ravalli County Commissioners is currently conducting an Environmental Assessment (EA) for the county airport near the City of Hamilton. The EA is being conducted by the engineering firm of Morrison-Maierle, Inc. in accordance with the Federal Aviation Administration (FAA) requirements and guidelines with joint funding from the FAA.

The Ravalli County Airport is located in western Montana, one mile east of the City of Hamilton in Township 6 North, Range 5 East, in Sections 20 and 29 to the Principal Montana Meridian at NAD 83 North Latitude 46 degrees 14' 51.4", and West Longitude 114 degrees 07' 35.8", County of Ravalli, State of Montana.


The attached Exhibit shows the location and extent of the improvements proposed for the airport for the time frame ending in the year 2020.

We are requesting interested Agency and individual comments regarding the full twenty year plan of airport developments recommended. Areas of the affected environment of particular interest for which we are soliciting your input include, but are not limited to, the following:

Noise	Endangered and Threatened Species
Compatible Land Use	Wetlands
Air Quality	Flood Plains
Water Quality	Wild and Scenic Rivers
Biotic Communities	Farmlands
Solid Waste	Energy and Natural Resources
DOT Act, Section 4(f) Lands	Light Emissions
Historic, Cultural Resources	Construction Impacts

Thank you in advance for your input and attention to this important matter. Please contact me in our Bozeman office at (406) 587-0721 if you have any questions.

Sincerely,
Morrison-Maierle, Inc.


Scott T. Bell, P.E.
Project Manager

Enclosure
H:\0877\EA\Agency Letters\Request for Comments 8_3_04.doc

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May 23, 2006

Montana Department of Fish, Wildlife, and Parks
John Vore, Wildlife Biologist
1104 South Third Street
Hamilton, MT 59840

Subject: Ravalli County Airport – Transmittal of Draft Environmental Assessment and
Request for Review
MMI#: 0877.008

Dear Mr. Vore:

Please find enclosed one copy of the revised preliminary draft Environmental Assessment (EA) for the proposed development and improvement project at the Ravalli County Airport. The project site is located approximately 1 mile east of Hamilton, Montana in Sections 20 and 29 of Township 6 North, Range 20 West, P.M.M., Ravalli County, Montana. The Federal Aviation Administration – Helena Airports District Office (FAA Helena) has requested comprehensive federal/state agency review of the revised draft EA that was completed by Monger and Associates, LLC and Morrison-Maierle, Inc. in May 2006. We are requesting a review from Montana Department of Fish, Wildlife, and Parks of this draft EA for potential environmental impacts to general wildlife species and wildlife habitat.

The enclosed draft EA document addresses the proposed development and improvement project for the Ravalli County Airport. This draft EA is intended to identify and address potential impacts associated with the proposed project development activities. The airport is currently accommodating aircraft that exceed the operation design limitations of the existing facilities, which has resulted in the need for the proposed development and improvement project. The purpose of the proposed airport development is to bring the airport into compliance with federal standards and to enhance the safety of persons in aircraft and on the ground. Four development alternatives were identified in this draft EA: 1) No Action, 2) Widen Existing Runway, 3) Relocate Runway 240 Feet East, and 4) Relocate Runway 400 Feet East. The draft EA document has identified Alternative Four as the preferred alternative due to increased runway length and safety, increased distance from present and future structures, and the provision of additional space for future expansion, if needed.

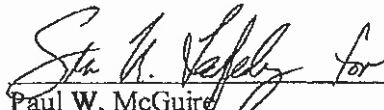
At your earliest convenience, please review this draft EA document for potential environmental impacts to general wildlife species and habitat resulting from proposed

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project activities. Following your review of this draft EA, your comments will be reviewed for incorporation into a final draft EA document that will be submitted to FAA Helena and made available for public comment.

Thank you for your time and review of the enclosed document. If you have any questions or comments regarding the information provided, please call me at (406) 587-0721.

Sincerely,
Morrison-Maierle, Inc.


Paul W. McGuire
Senior Environmental Scientist

PWM/TCT

Enclosure

cc: ~~Scott Bell, MMA~~ 1/0
John Styba, FAA Helena 1/0
Glenda Wiles, Ravalli County Commissioners 1/0



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May 23, 2006

Montana Department of Fish, Wildlife, and Parks
Bitterroot National Forest Office
Chris Clancy, Fisheries Biologist
1801 North First Avenue
Hamilton, MT 59840

Subject: Ravalli County Airport – Transmittal of Draft Environmental Assessment and
Request for Review
MMI#: 0877.008

Dear Mr. Clancy:

Please find enclosed one copy of the revised preliminary draft Environmental Assessment (EA) for the proposed development and improvement project at the Ravalli County Airport. The project site is located approximately 1 mile east of Hamilton, Montana in Sections 20 and 29 of Township 6 North, Range 20 West, P.M.M., Ravalli County, Montana. The Federal Aviation Administration – Helena Airports District Office (FAA Helena) has requested comprehensive federal/state agency review of the revised draft EA that was completed by Monger and Associates, LLC and Morrison-Maierle, Inc. in May 2006. We are requesting a review from Montana Department of Fish, Wildlife, and Parks of this draft EA for potential environmental impacts to general fisheries, fish species, and aquatic habitat.

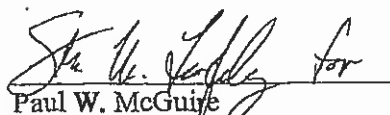
The enclosed draft EA document addresses the proposed development and improvement project for the Ravalli County Airport. This draft EA is intended to identify and address potential impacts associated with the proposed project development activities. The airport is currently accommodating aircraft that exceed the operation design limitations of the existing facilities, which has resulted in the need for the proposed development and improvement project. The purpose of the proposed airport development is to bring the airport into compliance with federal standards and to enhance the safety of persons in aircraft and on the ground. Four development alternatives were identified in this draft EA: 1) No Action, 2) Widen Existing Runway, 3) Relocate Runway 240 Feet East, and 4) Relocate Runway 400 Feet East. The draft EA document has identified Alternative Four as the preferred alternative due to increased runway length and safety, increased distance from present and future structures, and the provision of additional space for future expansion, if needed.

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At your earliest convenience, please review this draft EA document for potential environmental impacts to general fisheries, fish species, and aquatic habitat resulting from proposed project activities. Following your review of this draft EA, your comments will be reviewed for incorporation into a final draft EA document that will be submitted to FAA Helena and made available for public comment.

Thank you for your time and review of the enclosed document. If you have any questions or comments regarding the information provided, please call me at (406) 587-0721.

Sincerely,
Morrison-Maierle, Inc.


Paul W. McGuire
Senior Environmental Scientist

PWM/TCT

Enclosure

cc: Scott Bell, MMI 1/0
John Styba, FAA Helena 1/0
Glenda Wiles, Ravalli County Commissioners 1/0

0877-008

STATE
Correspondence

From: Chris Clancy <cclancy@fs.fed.us>
To: "Erik Nyquist" <enyquist@m-m.net>
Date: 4/12/2005 1:04:45 PM
Subject: Re: Gird Creek Fish Survey Results

I sent one message and it was rejected, so I am glad you sent this. On 3/10/05, we electrofished 300 feet of the the two channels of "Gird Creek" about 75 yards north of the Ravalli County Airport runways and captured a few longnose suckers and spotted frogs. No other species of fish were seen.

FILE COPY

"Erik Nyquist"
<enyquist@m-m.net>
> To
<cclancy@fs.fed.us>
04/11/2005 09:44 CC
AM "Erik Nyquist" <enyquist@m-m.net>
Subject
Gird Creek Fish Survey Results

Hey Chris,
You might be out of the office since I didn't hear back from you last week, but when you get a chance could you please email me a short note summarizing the electrofishing survey that you performed on Gird Creek?
Thank you very much
Erik Nyquist



memo

Project No.: 0877.008
Project Name: Ravalli County Airport
Date: 3/14/05
Time of Call: 10:30 AM
Call To: Chris Clancy Montana Fish, Wildlife, and Parks
Tel. No.: (406) 363-7169

FILE COPY

SUBJECT: Gird Creek Fisheries Survey

Mr. Clancy stated that a fisheries survey was conducted on 3/10/05. Two 300-foot reaches of Gird Creek were shocked. A couple of long-nosed suckers (*Catostomus macrocheilus*) were the only fish identified within the reaches. There were no trout located within the reaches. Mr. Clancy stated that the fisheries information that MFWP has for Gird Creek near the Teller Wildlife Refuge is not actually the historic Gird Creek channel, but may receive surface water from Gird Creek.

When asked about concerns regarding permitting (124 permit) for the reach of Gird Creek associated with the proposed project, Mr. Clancy stated that he would like to see a culvert installed to allow fish passage through Gird Creek and that burying the culvert to keep the stream gradient the same as existing conditions would be ideal.

Contacted by: Erik Nyquist

A handwritten signature in black ink, appearing to read "Erik Nyquist", written over a horizontal line.



**Montana Fish,
Wildlife & Parks**

RECEIVED JAN 03 2005

Region 2 Office
3201 Spurgin Road
Missoula, MT 59804-3101
406-542-5500
December 20, 2004

Scott Bell, Project Manager
Morrison Maierle, Inc.
PO Box 113
Bozeman, MT 59771-1113

Dear Mr. Bell:

Reference: Ravalli County Airport--Draft Environmental Assessment

We have reviewed the draft EA for this project, and our comments follow.

1. The document gives a general description on the impacts expected to Gird Creek but specifics are unclear. For example, a "310" (MT Natural Streambed and Land Preservation Act) permit would be required but it is not clear what specific impact(s) to the creek are expected. No fisheries data exist in this reach of Gird Creek, and it must be interpolated between data upstream and downstream of the airport. While this does give a general idea of the fish present in this stream reach, we would be willing to sample the fishery in the affected area to get more detailed information.
2. The conclusion that "bull trout are not likely to reside in the reach of Gird Creek associated with this project" is probably correct, but a stream survey would be helpful. The report suggests, "ocular monitoring of the project corridor for the presence of bull trout" during construction. A stream survey by electrofishing or snorkeling would be more reliable, and we are willing to help. (Please contact Bitterroot fisheries biologist Chris Clancy, 363-7169, cclancy@state.mt.us, for fisheries issues pertaining to this project.)

Thank you for providing the opportunity for MFWP to comment on this project. We would like to remain on the mailing list for this project.

Sincerely,

Mack Long
Regional Supervisor

ML/sr



Montana Fish, Wildlife & Parks

RECEIVED AUG 30 2004

Region 2 Office
3201 Spurgin Road
Missoula, MT 59804-3101
406-542-5500
August 26, 2004

Scott Bell, Project Manager
Morrison Maierle, Inc.
PO Box 113
Bozeman, MT 59771-1113

Dear Mr. Bell:

Reference: Ravalli County Airport (T6N, R20W, Sections 20 & 29)--Proposed
improvements (scoping for EA)

We have reviewed the project improvements summary and graphics provided for this project, and our comments follow.

1. Looking at the photo and topo maps provided, it appears that the new runway would be built over a portion of what appears to be Gird Creek. We ask that issues related to Gird Creek and/or associated waterways be addressed in the EA. MFWP's Bitterroot fisheries biologist is Chris Clancy (363-7169; cclancy@state.mt.us); please feel free to contact him.
2. The north end of the proposed runway appears to be cutting into a bench that is about 30 feet or higher than Gird Creek. Not knowing the exact construction plans for this end of the runway, we point out that such land formations often function as wildlife movement corridors, and can funnel animals into the area below the bench. We suggest addressing this issue in the EA.
3. Some waterfowl are associated with the nearby creeks and irrigation canals, and birds such as ring-necked pheasant can be found in nearby fields. We suggest addressing possible flight safety issues related to these or other birds.

Thank you for providing the opportunity for MFWP to comment on this project. We would like to remain on the mailing list for this project.

Sincerely,

Mack Long
Regional Supervisor

ML/sr

August 4, 2004

Montana Fish, Wildlife & Parks
Region 2 Headquarters
3201 Spurgin Road
Missoula, MT 59804-3099

Re: Request for Agency Comments
Ravalli County Airport Environmental Assessment of Proposed Improvements

The Board of Ravalli County Commissioners is currently conducting an Environmental Assessment (EA) for the county airport near the City of Hamilton. The EA is being conducted by the engineering firm of Morrison-Maierle, Inc. in accordance with the Federal Aviation Administration (FAA) requirements and guidelines with joint funding from the FAA.

The Ravalli County Airport is located in western Montana, one mile east of the City of Hamilton in Township 6 North, Range 5 East, in Sections 20 and 29 to the Principal Montana Meridian at NAD 83 North Latitude 46 degrees 14' 51.4", and West Longitude 114 degrees 07' 35.8", County of Ravalli, State of Montana.

The attached Exhibit shows the location and extent of the improvements proposed for the airport for the time frame ending in the year 2020.

We are requesting interested Agency and individual comments regarding the full twenty year plan of airport developments recommended. Areas of the affected environment of particular interest for which we are soliciting your input include, but are not limited to, the following:

Noise	Endangered and Threatened Species
Compatible Land Use	Wetlands
Air Quality	Flood Plains
Water Quality	Wild and Scenic Rivers
Biotic Communities	Farmlands
Solid Waste	Energy and Natural Resources
DOT Act, Section 4(f) Lands	Light Emissions
Historic, Cultural Resources	Construction Impacts

Thank you in advance for your input and attention to this important matter. Please contact me in our Bozeman office at (406) 587-0721 if you have any questions.

Sincerely,
Morrison-Maierle, Inc.


Scott T. Bell, P.E.
Project Manager

Enclosure
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MONTANA HISTORICAL SOCIETY

225 North Roberts ♦ P.O. Box 201201 ♦ Helena, MT 59620-1201
♦ (406) 444-2694 ♦ FAX (406) 444-2696 ♦ www.montanahistoricalsociety.org ♦

August 31, 2004

John Styba
Civil Engineer US DOT
Federal Aviation
2725 Skyway Drive, Suite 2
Helena, MT 59602

Ref: Hamilton Airport

Dear John:

A few historical facts regarding the Hamilton Airport buildings have come to light since our last correspondence on the topic. This information was submitted to us by the Bitterroot Land Trust (BLT) and the Montana Preservation Alliance (MPA), and it strengthens the eligibility status of the Daly Ditch Irrigation District Buildings, formerly hangars owned by Hayward Flying Service. The GCM report lists these hangars as Feature 1 with a round-arch roof, and Feature 2 a Quonset-style structure.

As you recall GCM states that these buildings are not eligible for National Register listing, a conclusion we disagree with in our July 8, 2004 letter to you. In order to resolve the eligibility of these buildings, we request that the FAA concur or disagree in writing with our determination of eligibility. Below is information about Features 1 and 2 that BLT and MPA uncovered.

Feature 1

Based on information in the book, Flying with Eagles by local author and pilot, Charles Duus, the rear low-sloped gable roofed hangar on the rear of Feature 1 was built in 1934 for use by Hayward Flying Service. The round-arch roofed addition was added onto the front of the 1934 hangar in the fall of 1942. A 1943 shed addition attached to the round-arched section was built as classroom space to train women pilots during World War II for the Women's Auxiliary Ferrying Service. The Montana SHPO believes that this hangar is eligible under Criterion A for its association with early Montana aviation, and its connection with the war effort and women in aviation.

Feature 2

According to Duus, Feature 2, the Quonset-style hangar, was built in 1945 to house aircraft acquired after the war. This was used as part of a flight-training program for war veterans, funded by the GI Bill. We believe that Feature 2 is eligible under Criterion C, as a good example of the utilitarian Quonset style construction that gained popularity

STATE HISTORIC PRESERVATION OFFICE ♦ 1410 8th Ave ♦ P.O. Box 201202 ♦ Helena, MT 59620-1202
♦ (406) 444-7715 ♦ FAX (406) 444-6575

during the war effort. Based on the information submitted by the Bitterroot Land Trust we believe that it may be eligible under Criteria A, however, we do not know enough about the legacy of the post-war pilot training program to know how it may have contributed to the broader patterns of aviation history.

Please feel free to call me if you have questions regarding this letter. Thank you.

Regards,



Pete Brown
Historic Architecture Specialist
Montana SHPO
406-444-7718

File: FAA-2004

RECEIVED AUG - 9 2004



MONTANA HISTORICAL SOCIETY

225 North Roberts ♦ P.O. Box 201201 ♦ Helena, MT 59620-1201
♦ (406) 444-2694 ♦ FAX (406) 444-2696 ♦ www.montanahistoricalsociety.org ♦

August 5, 2004

Scott T. Bell
Morrison Maierle, Inc.
901 Technology Blvd
PO Box 1113
Bozeman MT 59771

RE: RAVALLI COUNTY AIRPORT IMPROVEMENTS EA. SHPO Project #:
2004080503

Dear Mr. Bell:

I have conducted a cultural resource file search for the above-cited project located in Sections 20,29, T6 R5E. According to our records there have been no previously recorded historic or archaeological sites within the designated search locale. The absence of cultural properties in the area does not mean that they do not exist but rather may reflect the absence of any previous cultural resource inventory in the area, as our records indicated none.

Based on the lack of previous inventory and the ground disturbance required by this undertaking we feel that this project has the potential to impact cultural properties. We, therefore, recommend that a cultural resource inventory be conducted in order to determine whether or not sites exist and if they will be impacted. Thank you for consulting with us.

If you have any further questions or comments you may contact me at (406) 444-7767 or by e-mail at dmurdo@state.mt.us.

Sincerely,

Damon Murdo
Cultural Records Manager

File: US/FAA/2004



MONTANA HISTORICAL SOCIETY

225 North Roberts * P.O. Box 201201 * Helena, MT 59620-1201
* (406) 444-2694 * FAX (406) 444-2696 * www.montanahistoricalsociety.org *

July 8, 2004

John W. Styba
Civil Engineer US DOT
Fed. Aviation
2725 Skyway Drive Suite 2
Helena, MT 59602

RECEIVED

JUL 12 2004

HLN/ADO

Ref: Runway relocation at Ravalli County Airport, Hamilton

Dear Mr. Styba:

We reviewed the information you sent regarding the above referenced project. We believe the Hedge Ditch, Leonardi Place, and Daly Ditch & Irrigation Co. buildings on the airport property are eligible for National Register listing. We also believe that the work you propose represents no adverse effect to these eligible properties since the project involves moving the existing runways further north and east, away from the historic properties.

Thank you for consulting with us.

Sincerely,

Pete Brown
Historic Architecture Specialist
Montana SHPO
406-444-7718

File: FAA-Ravalli-2004062108

RECEIVED JUN 22 2004



U. S. Department
Of Transportation

Federal Aviation
Administration

Helena Airports District Office
2725 Skyway Drive, Suite 2
Helena, Montana 59602

June 21, 2004

Ravalli County Commissioners
Courthouse-Box 5001
Hamilton, MT 59840

Dear Commissioners:

This letter is a follow up to the phone conversation last week between John Styba of our office and Commissioner Thompson regarding buildings associated with the old Leonardi place acquired under AIP Project No. 3-30-0037-004-2002.

A cultural resource survey was completed on May 26, 2004 by GCM Services, Inc. as a part of the on-going environmental assessment (EA) being accomplished under AIP Project No. 3-30-0037-005-2003 for the proposed runway relocation project. This survey was completed for the existing Ravalli County Airport property as well as for land proposed for future acquisition. We suggest that you obtain a copy of the inventory from your Consultant, Scott Bell of Morrison-Maierle.

We recently completed our review of the findings in the Cultural Resource Survey. Although the survey did not find any potential or existing historic features in the proposed runway relocation project impact area, it did determine that three buildings on existing airport land were eligible for historic classification and protection. The survey identifies a house - feature 1, a bunkhouse - feature 2, and a barn - feature 10, associated with the old Leonardi Place as eligible for National Register of Historic Places (NRHP) under Criterion C, for their embodiment of the distinctive characteristics of the type, period and method of construction.

These three buildings should not be disturbed until the State Historic Preservation Office makes its final determination regarding historic significance and an acceptable mitigation plan is approved. This is contrary, however, to the AIP-04 Grant Special Conditions No. 16 and 17 that state:

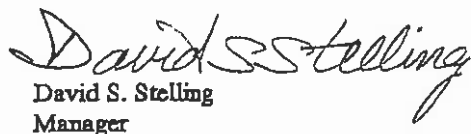
16. We understand and agree to the 5-year agricultural lease associated with Parcels 7 and 9 as part of the fee negotiation. By its acceptance hereof the Sponsor covenants and agrees that it will clear Parcel 9 acquired in Fee Simple under this project as shown on Exhibit "A" of any existing structures within a 5-year period of acquisition. This includes the former residence and out buildings. The Sponsor agrees to reimburse FAA the federal share portion of the appraised value of these structures (appraised value for residence at \$139,000, and \$16,000 for the out buildings) if these structures are not removed within the designated period.
17. The Sponsor agrees that it will not erect nor permit the erection of any permanent structures in the approach protection land Parcels 7 and 9 except those required for aids to air navigation or those that may be specifically approved by the FAA. The Sponsor agrees to remove the fence in the taxiway object free area for Parcel 8 within 30 days of acquisition. As per the grant assurances attached to the project Application, all revenue generated on the airport must be used for the airport's operation and maintenance, including any revenue generated from any lease of the former residential building located on Parcel 9 from the time of acquisition to its removal as described in the above special condition.

As a result of the May 26, 2004 Cultural Resource Survey conducted by GCM Services, Inc., we are modifying Special Conditions 16. and 17. to the AIP 3-30-0037-004-2002 grant to require that the referenced buildings not be disturbed until a final determination regarding historic significance is made by the State Historic Preservation Office and an acceptable mitigation plan is approved. The changes to the special conditions are as follows:

16. We understand and agree to the 5-year agricultural lease associated with Parcels 7 and 9 as part of the fee negotiation. By its acceptance hereof the Sponsor covenants and agrees that it will clear Parcel 9 acquired in Fee Simple under this project as shown on Exhibit "A" of any existing structures within a 5-year period of acquisition, except for the house – feature 1, bunkhouse – feature 2, and barn – feature 10 as shown on pages 11 and 12 of the May 26, 2004 Cultural Resource Survey conducted by GCM Services. These buildings are associated with the old Leonardi Place and have been identified as eligible for NRPH under Criterion C, for their embodiment of the distinctive characteristics of the type, period and method of construction. The structures shall not be disturbed until a final determination is made regarding historic significance is made by the State Historic Preservation Office and an acceptable mitigation plan is approved.
17. The Sponsor agrees that it will not erect nor permit the erection of any permanent structures in the approach protection land Parcels 7 and 9 except those required for aids to air navigation or those that may be specifically approved by the FAA. The Sponsor agrees to remove the fence in the taxiway object free area for Parcel 8 within 30 days of acquisition. As per the grant assurances attached to the project Application, all revenue generated on the airport must be used for the airport's operation and maintenance, including any revenue generated from any lease of the former residential building located on Parcel 9.

Please contact John Styba of this office at (406) 449-5279 if you have any questions regarding this issue.

Sincerely,


David S. Stelling
Manager

cc: Scott Bell, Morrison-Maierle, Bozeman, MT

RECEIVED JUN 21 2004



U. S. Department
of Transportation

Federal Aviation
Administration

AIRPORTS DISTRICT OFFICE
2725 Skyway Drive, Suite 2
Helena, MT 59602-1213

June 18, 2004

State Historic Preservation Office
Montana Historical Society
1410 8th Avenue
P.O. Box 201202
Helena, MT 59620-1202

Dear Sirs:

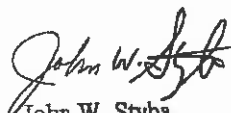
We are writing with regards to the Cultural Resource Inventory, attached with this letter, which was conducted by GCM Services, Inc. for the proposed runway relocation project at Ravalli County Airport, Hamilton, MT, and funded in part through the Federal Airport Improvement Program. The proposed project involves moving the North-South Runway 16-34, 400 feet to the East and shifting the runway 1,000 feet to the North. The current runway would then become the parallel taxiway to the new relocated runway

Morrison-Maierle, who is the lead consultant on the project, had hired GCM Services, Inc to perform the inventory and survey. The attached inventory identifies structures (house - feature 1, bunkhouse - feature 2, and barn - feature 10) associated with the old Leonardi Place as eligible for NRPH under Criterion C, for their embodiment of the distinctive characteristics of the type, period and method of construction. The old Leonardi Place (108 acres) was purchased in 2002 by the Airport Sponsor (Ravalli County) with assistance of federal funds as approach protection for the current runway alignment (to prevent incompatible land use or erection of structures that could interfere with the safe and efficient use of the airport).

The proposed runway relocation project moves the runway environment further away from the old Leonardi Place (400 feet further east and 1,000 feet further north) and in itself will have no impact on these potential historic structures. The proposed project is also well away from the potential historical interests (Hedge Ditch, 24RA764, and Daly Ditch. We have reviewed this report and agree with the conclusions reached by GCM Services, Inc.

Please review the referenced material and advise us as to your concurrence or comments. If you have any questions, please call me at 449-5279.

Sincerely,


John W. Styba
Civil Engineer

1 Enclosure

cc: via e-mail
Scott Bell, Morrison-Maierle, Bozeman, MT



ENGINEERS
SCIENTISTS
SURVEYORS
PLANNERS

901 TECHNOLOGY BLVD • P.O. BOX 1113 • BOZEMAN, MT 59711 • 406-587-0721 • FAX: 406-587-1176

August 4, 2004

State Historical Preservation Office
Attn: Stan Wilmoth
P.O. Box 210202
Helena, MT 59620-1202

Re: Request for Agency Comments
Ravalli County Airport Environmental Assessment of Proposed Improvements

The Board of Ravalli County Commissioners is currently conducting an Environmental Assessment (EA) for the county airport near the City of Hamilton. The EA is being conducted by the engineering firm of Morrison-Maierle, Inc. in accordance with the Federal Aviation Administration (FAA) requirements and guidelines with joint funding from the FAA.

The Ravalli County Airport is located in western Montana, one mile east of the City of Hamilton in Township 6 North, Range 5 East, in Sections 20 and 29 to the Principal Montana Meridian at NAD 83 North Latitude 46 degrees 14' 51.4", and West Longitude 114 degrees 07' 35.8", County of Ravalli, State of Montana.

The attached Exhibit shows the location and extent of the improvements proposed for the airport for the time frame ending in the year 2020.

We are requesting interested Agency and individual comments regarding the full twenty year plan of airport developments recommended. Areas of the affected environment of particular interest for which we are soliciting your input include, but are not limited to, the following:

Noise	Endangered and Threatened Species
Compatible Land Use	Wetlands
Air Quality	Flood Plains
Water Quality	Wild and Scenic Rivers
Biotic Communities	Farmlands
Solid Waste	Energy and Natural Resources
DOT Act, Section 4(f) Lands	Light Emissions
Historic, Cultural Resources	Construction Impacts

Thank you in advance for your input and attention to this important matter. Please contact me in our Bozeman office at (406) 587-0721 if you have any questions.

Sincerely,
Morrison-Maierle, Inc.


Scott T. Bell, P.E.
Project Manager

Enclosure
H:\0877\EA\Agency Letters\Request for Comments 8_3_04.doc

"Providing resources in partnership with clients to achieve their goals"

August 4, 2004

Montana Historical Society
225 North Roberts, P.O. Box 201201
Helena, MT 59620-1201

Re: Request for Agency Comments
Ravalli County Airport Environmental Assessment of Proposed Improvements

The Board of Ravalli County Commissioners is currently conducting an Environmental Assessment (EA) for the county airport near the City of Hamilton. The EA is being conducted by the engineering firm of Morrison-Maierle, Inc. in accordance with the Federal Aviation Administration (FAA) requirements and guidelines with joint funding from the FAA.

The Ravalli County Airport is located in western Montana, one mile east of the City of Hamilton in Township 6 North, Range 5 East, in Sections 20 and 29 to the Principal Montana Meridian at NAD 83 North Latitude 46 degrees 14' 51.4", and West Longitude 114 degrees 07' 35.8", County of Ravalli, State of Montana.

The attached Exhibit shows the location and extent of the improvements proposed for the airport for the time frame ending in the year 2020.

We are requesting interested Agency and individual comments regarding the full twenty year plan of airport developments recommended. Areas of the affected environment of particular interest for which we are soliciting your input include, but are not limited to, the following:

Noise	Endangered and Threatened Species
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Air Quality	Flood Plains
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Biotic Communities	Farmlands
Solid Waste	Energy and Natural Resources
DOT Act, Section 4(f) Lands	Light Emissions
Historic, Cultural Resources	Construction Impacts

Thank you in advance for your input and attention to this important matter. Please contact me in our Bozeman office at (406) 587-0721 if you have any questions.

Sincerely,
Morrison-Maierle, Inc.


Scott T. Bell, P.E.
Project Manager

Enclosure
H:\0877\EA\Agency Letters\Request for Comments 8_3_04.doc

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May 23, 2006

U.S. Army Corps of Engineers
Helena Regulatory Office
Allan Steinle, State Program Manager
10 West 15th Street, Suite 2200
Helena, MT 59626

Subject: Ravalli County Airport – Transmittal of Draft Environmental Assessment and
Request for Review
MMI#: 0877.008

Dear Allan,

Please find enclosed one copy of the revised preliminary draft Environmental Assessment (EA) for the proposed development and improvement project at the Ravalli County Airport. The project site is located approximately 1 mile east of Hamilton, Montana in Sections 20 and 29 of Township 6 North, Range 20 West, P.M.M., Ravalli County, Montana. The Federal Aviation Administration – Helena Airports District Office (FAA Helena) has requested comprehensive federal/state agency review of the revised draft EA that was completed by Monger and Associates, LLC and Morrison-Maierle, Inc. in May 2006. We are requesting a review from the U.S. Army Corps of Engineers of this draft EA for potential environmental impacts to jurisdictional waters of the U.S.

The enclosed draft EA document addresses the proposed development and improvement project for the Ravalli County Airport. This draft EA is intended to identify and address potential impacts associated with the proposed project development activities. The airport is currently accommodating aircraft that exceed the operation design limitations of the existing facilities, which has resulted in the need for the proposed development and improvement project. The purpose of the proposed airport development is to bring the airport into compliance with federal standards and to enhance the safety of persons in aircraft and on the ground. Four development alternatives were identified in this draft EA: 1) No Action, 2) Widen Existing Runway, 3) Relocate Runway 240 Feet East, and 4) Relocate Runway 400 Feet East. The draft EA document has identified Alternative Four as the preferred alternative due to increased runway length and safety, increased distance from present and future structures, and the provision of additional space for future expansion, if needed.

"Providing resources in partnership with clients to achieve their goals"

At your earliest convenience, please review this draft EA document for potential environmental impacts to jurisdictional waters of the U.S. resulting from proposed project activities. Following your review of this draft EA, your comments will be reviewed for incorporation into a final draft EA document that will be submitted to FAA Helena and made available for public comment.

Thank you for your time and review of the enclosed document. If you have any questions or comments regarding the information provided, please call me at (406) 587-0721.

Sincerely,
Morrison-Maierle, Inc.


Paul W. McGuire
Senior Environmental Scientist

PWM/TCT

Enclosure

cc:

~~Scott Ball, MMT~~

1/0

John Styba, FAA Helena

1/0

Glenda Wiles, Ravalli County Commissioners

1/0



U.S. ARMY CORPS OF ENGINEERS
HELENA REGULATORY OFFICE
10 WEST 15TH STREET, SUITE 2200
HELENA, MONTANA 59626

0877.008

RECEIVED APR 29 2005

REPLY TO
ATTENTION OF:

April 27, 2005

Helena Regulatory Office
Phone (406) 441-1375 Fax (406) 441-1380

RE: Ravalli County Airport - Jurisdiction Determination
Corps File No. 200490554

Morrison-Maierle, Inc.
Attn: Mr. Paul McGuire
P.O. Box 1113
Bozeman, Montana 59771

Dear Mr. McGuire:

Reference is made to your request for a verification of wetland boundaries and a jurisdictional determination for the wetlands located within the Ravalli County Airport's proposed expansion area. The airport is located near Hamilton in Sections 20,29, Township 6 North, Range 20 West, Ravalli County, Montana.

Under the authority of Section 404 of the Clean Water Act, Department of the Army permits are required for the discharge of fill material into waters of the United States. Waters of the United States include the area below the ordinary high water mark of stream channels and lakes or ponds connected to the tributary system, and wetlands adjacent to these waters. In certain circumstances, isolated waters and man-made channels may also be considered waters of the United States and would be required to be evaluated on a case-by-case basis.

Based on the information provided and a subsequent field visit conducted on April 18, 2005 by Robert McInerney of our office, the site contained jurisdictional waters of the U.S. under the authority of Section 404 of the Clean Water Act. The enclosed Jurisdictional Determination (JD) form describes the extent of waters of the United States on the project site. This is an Approved Jurisdictional Determination, and it is valid for a period of 5 years from the date of this letter unless new information warrants revision of the determination before the expiration date. If you disagree with this jurisdictional determination, you have the right to appeal the decision. If you would like more information on the jurisdictional appeal process, contact this office.

From a further review of wetlands designated W-6-03, W-7-03, W-9-03, and W-10-03, it has been determined that they are jurisdictional based on being historic channels that meet the wetland criteria.

If you have any questions, please call Robert McInerney of this office at (406) 441-1375, and reference File No. 200490554.

Sincerely,

Allan Steinle

Montana Program Manager

Enclosures

JURISDICTIONAL DETERMINATION
U.S. Army Corps of Engineers

Revised 8/13/04

DISTRICT OFFICE: Omaha
FILE NUMBER: 200490554

PROJECT LOCATION INFORMATION:

State: Montana
County: Ravalli
Center coordinates of site (latitude/longitude):
Approximate size of area (parcel) reviewed, including uplands: acres.
Name of nearest waterway: Gird Creek
Name of watershed: Bitterroot

JURISDICTIONAL DETERMINATION

Completed: Desktop determination ☒ Date: 26 April 2005
Site visit(s) ☒ Date(s): 18 April 2005

Jurisdictional Determination (JD):

☐ Preliminary JD - Based on available information, ☐ there appear to be (or) ☐ there appear to be no "waters of the United States" and/or "navigable waters of the United States" on the project site. A preliminary JD is not appealable (Reference 33 CFR part 331).

☒ Approved JD - An approved JD is an appealable action (Reference 33 CFR part 331).
Check all that apply:

☐ There are "navigable waters of the United States" (as defined by 33 CFR part 329 and associated guidance) within the reviewed area. Approximate size of jurisdictional area:

☒ There are "waters of the United States" (as defined by 33 CFR part 328 and associated guidance) within the reviewed area. Approximate size of jurisdictional area: 45.97 acres.

☐ There are "isolated, non-navigable, intra-state waters or wetlands" within the reviewed area.

☒ Decision supported by SWANCC/Migratory Bird Rule Information Sheet for Determination of No Jurisdiction.

BASIS OF JURISDICTIONAL DETERMINATION:

A. Waters defined under 33 CFR part 329 as "navigable waters of the United States":

☐ The presence of waters that are subject to the ebb and flow of the tide and/or are presently used, or have been used in the past, or may be susceptible for use to transport interstate or foreign commerce.

B. Waters defined under 33 CFR part 328.3(a) as "waters of the United States":

☐ (1) The presence of waters, which are currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide.

☐ (2) The presence of interstate waters including interstate wetlands¹.

☐ (3) The presence of other waters such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds, the use, degradation or destruction of which could affect interstate commerce including any such waters (check all that apply):

☐ (i) which are or could be used by interstate or foreign travelers for recreational or other purposes.

☐ (ii) from which fish or shellfish are or could be taken and sold in interstate or foreign commerce.

☐ (iii) which are or could be used for industrial purposes by industries in interstate commerce.

☐ (4) Impoundments of waters otherwise defined as waters of the US.

☒ (5) The presence of a tributary to a water identified in (1) - (4) above.

☐ (6) The presence of territorial seas.

☒ (7) The presence of wetlands adjacent² to other waters of the US, except for those wetlands adjacent to other wetlands.

Rationale for the Basis of Jurisdictional Determination (applies to any boxes checked above). If the jurisdictional water or wetland is not itself a navigable water of the United States, describe connection(s) to the downstream navigable waters. If B(1) or B(3) is used as the Basis of Jurisdiction, document navigability and/or interstate commerce connection (i.e., discuss site conditions, including why the waterbody is navigable and/or how the destruction of the waterbody could affect interstate or foreign commerce). If B(2, 4, 5 or 6) is used as the Basis of Jurisdiction, document the rationale used to make the determination. If B(7) is used as the Basis of Jurisdiction, document the rationale used to make adjacency determination: Gird Creek drains into the Bitterroot River which flows to the Clark Fork which in turns flows to Idaho and eventually into the Columbia River, a Section 10 navigable water.



U.S. ARMY CORPS OF ENGINEERS

HELENA REGULATORY OFFICE
10 WEST 15TH STREET, SUITE 2200
HELENA, MONTANA 59626

REPLY TO
ATTENTION OF:

August 25, 2004

RECEIVED AUG 30 2004

Helena Regulatory Office
Phone (406) 441-1375
Fax (406) 441-1380

**RE: Ravalli County Airport
Corps File No. 200490554**

Morrison Maierle, Inc.
Attn: Scott T. Bell, P.E.
P.O. Box 1113
Bozeman, Montana 59771

Dear Mr. Bell:

Reference is made to your letter requesting comments regarding the proposed improvements to the Ravalli County Airport near Hamilton. The airport is located in Sections 20 and 29, Township 6 North, Range 20 West, Ravalli County, Montana.

Under the authority of Section 404 of the Clean Water Act, Department of the Army permits are required for the discharge of fill material into waters of the United States. Waters of the United States include the area below the ordinary high water mark of stream channels and lakes or ponds connected to the tributary system, and wetlands adjacent to these waters. In certain circumstances, isolated waters and man-made channels may also be considered waters of the United States and would be required to be evaluated on a case-by-case basis.

Based on the information provided, if there is to be any placement of fill in Gird Creek or in any other jurisdictional area mentioned above then a Department of the Army permit may be necessary.

If you have any questions, please call Robert McInerney of this office at (406) 441-1375, and reference File No. 200490554.

Sincerely,

Allan Steinle
Montana Program Manager



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August 4, 2004

U.S. Army Corps of Engineers
Helena Regulatory Office
10 West 15th Street, Suite 2200
Helena, MT 59626

Re: Request for Agency Comments
Ravalli County Airport Environmental Assessment of Proposed Improvements

The Board of Ravalli County Commissioners is currently conducting an Environmental Assessment (EA) for the county airport near the City of Hamilton. The EA is being conducted by the engineering firm of Morrison-Maierle, Inc. in accordance with the Federal Aviation Administration (FAA) requirements and guidelines with joint funding from the FAA.

The Ravalli County Airport is located in western Montana, one mile east of the City of Hamilton in Township 6 North, Range 5 East, in Sections 20 and 29 to the Principal Montana Meridian at NAD 83 North Latitude 46 degrees 14' 51.4", and West Longitude 114 degrees 07' 35.8", County of Ravalli, State of Montana.

The attached Exhibit shows the location and extent of the improvements proposed for the airport for the time frame ending in the year 2020.

We are requesting interested Agency and individual comments regarding the full twenty year plan of airport developments recommended. Areas of the affected environment of particular interest for which we are soliciting your input include, but are not limited to, the following:

Noise	Endangered and Threatened Species
Compatible Land Use	Wetlands
Air Quality	Flood Plains
Water Quality	Wild and Scenic Rivers
Biotic Communities	Farmlands
Solid Waste	Energy and Natural Resources
DOT Act, Section 4(f) Lands	Light Emissions
Historic, Cultural Resources	Construction Impacts

Thank you in advance for your input and attention to this important matter. Please contact me in our Bozeman office at (406) 587-0721 if you have any questions.

Sincerely,
Morrison-Maierle, Inc.


Scott T. Bell, P.E.
Project Manager

Enclosure
H:\0877\EA\Agency Letters\Request for Comments 8_3_04.doc

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May 23, 2006

Montana Department of Environmental Quality
Water Protection Bureau
Jeff Ryan, Water Quality Specialist
1520 East Sixth Avenue
P.O. Box 200901
Helena, MT 59620-0901

Subject: Ravalli County Airport – Transmittal of Draft Environmental Assessment and
Request for Review
MMI#: 0877.008

Dear Mr. Ryan:

Please find enclosed one copy of the revised preliminary draft Environmental Assessment (EA) for the proposed development and improvement project at the Ravalli County Airport. The project site is located approximately 1 mile east of Hamilton, Montana in Sections 20 and 29 of Township 6 North, Range 20 West, P.M.M., Ravalli County, Montana. The Federal Aviation Administration – Helena Airports District Office (FAA Helena) has requested comprehensive federal/state agency review of the revised draft EA that was completed by Monger and Associates, LLC and Morrison-Maierle, Inc. in May 2006. We are requesting a review from the Montana Department of Environmental Quality of this draft EA for potential environmental impacts to surface and groundwater quality.

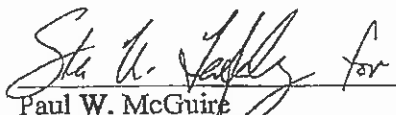
The enclosed draft EA document addresses the proposed development and improvement project for the Ravalli County Airport. This draft EA is intended to identify and address potential impacts associated with the proposed project development activities. The airport is currently accommodating aircraft that exceed the operation design limitations of the existing facilities, which has resulted in the need for the proposed development and improvement project. The purpose of the proposed airport development is to bring the airport into compliance with federal standards and to enhance the safety of persons in aircraft and on the ground. Four development alternatives were identified in this draft EA: 1) No Action, 2) Widen Existing Runway, 3) Relocate Runway 240 Feet East, and 4) Relocate Runway 400 Feet East. The draft EA document has identified Alternative Four as the preferred alternative due to increased runway length and safety, increased distance from present and future structures, and the provision of additional space for future expansion, if needed.

"Providing resources in partnership with clients to achieve their goals"

At your earliest convenience, please review this draft EA document for potential environmental impacts to surface and groundwater quality resulting from proposed project activities. Following your review of this draft EA, your comments will be reviewed for incorporation into a final draft EA document that will be submitted to FAA Helena and made available for public comment.

Thank you for your time and review of the enclosed document. If you have any questions or comments regarding the information provided, please call me at (406) 587-0721.

Sincerely,
Morrison-Maierle, Inc.


Paul W. McGuire
Senior Environmental Scientist

PWM/TCT

Enclosure

cc: Scott Bell, MVI 1/0
John Styba, FAA Helena 1/0
Glenda Wiles, Ravalli County Commissioners 1/0

From: "Ryan, Jeff" <jeryan@mt.gov>
To: <pmcguire@m-m.net>
Date: 5/25/2006 9:07 am
Subject: FW: Ravalli County Airport Draft EA MMI#:0877.008

-----Original Message-----

From: Ryan, Jeff
Sent: Thursday, May 25, 2006 9:01 AM
To: 'pmcguire@m_m.net'
Subject: FW: Ravalli County Airport Draft EA MMI#:0877.008

-----Original Message-----

From: Ryan, Jeff
Sent: Thursday, May 25, 2006 8:57 AM
To: 'pmcguire@m_m.net'
Cc: Ellerhoff, Thomas
Subject: Ravalli County Airport Draft EA MMI#:0877.008

Paul, Thanks for the opportunity to comment on the subject draft EA Morrison Maierle prepared for the proposed Ravalli Co. Airport expansion - I didn't have a lot of time to review it, but overall it looked very thorough - especially in my area of interest - aquatic resources. Only a couple of minor comments - in the "Water Quality" section a discussion on incorporating some sort of small retention basins in the design, in addition to vegetated swales might be valuable - the retention basins could help treat runway runoff, but possibly more important, provide a line of defense if a major chemical spill occurs and there isn't time to use the containment/absorbent devices noted in the EA, before the material leaves the runway.

The only other thing I noticed, was that the Army Corps comments were dated 2002 - since that time, they have made considerable progress in setting up a mitigation program for stream and river impacts. The EA notes some fairly minor impacts to Gird Creek. However, a discussion on potential compensatory mitigation for these impacts might be useful, considering that by the time this project applies for the Army Corps 404 permit, there may be a mitigation requirement for Gird Creek impacts - similar to the current requirements for wetland impacts.

Also, for future EA comment requests, it would be better to submit them to Tom Ellerhoff (444-5263). Tom works in the DEQ Director's office and can help disseminate EA comment requests to the appropriate DEQ areas of expertise.



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May 23, 2006

Montana Department of Environmental Quality
Air Quality Policy and Planning Section
Bob Habeck, Air Program Manager
1520 East Sixth Avenue
P.O. Box 200901
Helena, MT 59620-0901

Subject: Ravalli County Airport – Transmittal of Draft Environmental Assessment and
Request for Review
MMI#: 0877.008

Dear Mr. Habeck:

Please find enclosed one copy of the revised preliminary draft Environmental Assessment (EA) for the proposed development and improvement project at the Ravalli County Airport. The project site is located approximately 1 mile east of Hamilton, Montana in Sections 20 and 29 of Township 6 North, Range 20 West, P.M.M., Ravalli County, Montana. The Federal Aviation Administration – Helena Airports District Office (FAA Helena) has requested comprehensive federal/state agency review of the revised draft EA that was completed by Monger and Associates, LLC and Morrison-Maierle, Inc. in May 2006. We are requesting a review from the Montana Department of Environmental Quality of this draft EA for potential environmental impacts to air quality.

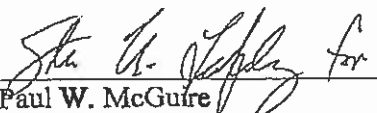
The enclosed draft EA document addresses the proposed development and improvement project for the Ravalli County Airport. This draft EA is intended to identify and address potential impacts associated with the proposed project development activities. The airport is currently accommodating aircraft that exceed the operation design limitations of the existing facilities, which has resulted in the need for the proposed development and improvement project. The purpose of the proposed airport development is to bring the airport into compliance with federal standards and to enhance the safety of persons in aircraft and on the ground. Four development alternatives were identified in this draft EA: 1) No Action, 2) Widen Existing Runway, 3) Relocate Runway 240 Feet East, and 4) Relocate Runway 400 Feet East. The draft EA document has identified Alternative Four as the preferred alternative due to increased runway length and safety, increased distance from present and future structures, and the provision of additional space for future expansion, if needed.

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At your earliest convenience, please review this draft EA document for potential environmental impacts to air quality resulting from proposed project activities. Following your review of this draft EA, your comments will be reviewed for incorporation into a final draft EA document that will be submitted to FAA Helena and made available for public comment.

Thank you for your time and review of the enclosed document. If you have any questions or comments regarding the information provided, please call me at (406) 587-0721.

Sincerely,
Morrison-Maierle, Inc.


Paul W. McGuire
Senior Environmental Scientist

PWM/TCT

Enclosure

cc: ~~Scott Bell, MMI~~ 1/0
John Styba, FAA Helena 1/0
Glenda Wiles, Ravalli County Commissioners 1/0

From: "Habeck, Bob" <bhabeck@mt.gov>
To: <pmcguire@m-m.net>
Date: 6/6/2006 10:59:19 am
Subject: Ravalli County Airport EA

Paul - I reviewed the air quality materials you sent to me on May 23, 2006. I concur with your assessment that air quality analysis is not required since Ravalli County is currently in unclassified/attainment status (40 CFR 81.327) for all criteria pollutants. As you noted, general conformity (40 CFR 93.153) is applicable only in nonattainment or maintenance areas.

As a side note, EPA is currently revising the PM-2.5 standard and Hamilton may challenge the new standard. However, any new nonattainment designation by EPA would not occur until 2010. I've attached a white paper on the revised PM-2.5 NAAQS for your interest.

Thanks!

NOTE MY NEW ADDRESS: bhabeck@mt.gov

BOB HABECK
Air Program Manager
MT Dept. of Environ. Quality
1520 E 6th Ave, Helena, MT 59620
(406) 444-7305 (work)
(406) 431-1359 (cell)
(406) 444-1499 (fax)

A Review of EPA's Proposed Revisions to the National Ambient Air Quality Standards - For - Particulate Matter

FINAL DRAFT

I. Introduction

EPA has proposed revisions to its national ambient air quality standards (NAAQS) for particulate matter (PM). The revisions affect standards PM less than 2.5 microns (PM-2.5) and for coarse-sized particles (PM-10 and PM10-2.5). The revisions would also affect the ambient air monitoring requirements for PM.

II. PM NAAQS & Related Rules Published in the Federal Register (FR)

11/1/05 at 70 FR 65984 – Proposed PM_{2.5} Implementation rule.
1/17/06 at 71 FR 2620 – Proposed PM NAAQS Revisions.
1/17/06 at 71 FR 2710 – Proposed PM Monitoring Regulations.
2/9/06 at 71 FR 6718 – ANPR Transition to New or Revised PM NAAQS.
3/10/06 at 71 FR 12592 – Proposed Exceptional Events rule.

III. Proposed Timeline for PM NAAQS Rulemaking

12/20/05 - Notice of proposed PM NAAQS rulemaking.
1/17/06 - Proposed PM NAAQS published in FR (start 90-day comment period).
4/17/06 - End of public comment period on proposed PM NAAQS.
9/27/06 - EPA issues final revised PM standards.
11/27/06 - EPA promulgates new PM standards.

IV. PM-2.5 NAAQS Compliance Designation Timeline

11/27/08 – States' recommendations to EPA (based on 2005-2007 monitoring data).
11/27/09 – EPA makes final designations (based on 2006-2008 monitoring data).
4/27/10 – Effective date for EPA's PM_{2.5} designations.
4/27/13 – Deadline for States to submit PM-2.5 State Implementation Plans (SIP).

V. PM10-2.5 NAAQS Compliance Designation Timeline

7/27/12 – States' recommendations to EPA (based on 2009-2011 monitoring data).
5/27/12 – EPA makes final designations.
7/27/13 – Effective date for EPA PM10-2.5 designations.
7/27/16 – Deadline for States to submit PM10-2.5 SIPs.

VI. Issues with the Proposed PM NAAQS

- EPA limits the PM10-2.5 standard to only defined urban areas (>100k pop.).
- EPA limits the PM10-2.5 standard to a specific source mix (no ag or mining).
- Proposed rulemaking is unclear which activities are considered part of mining and agricultural operations, thus exempted from PM10-2.5 control.
- Seasonal variability in meteorology and source activity makes it unclear when the PM10-2.5 standard even applies to an area.
- EPA proposes to revoke the PM-10 standards without adequate replacement protection.
- In the absence of a state and federal PM-10 standard, current permit conditions must be revised, reducing source hours of operation.
- Revoking the PM-10 standards will increase the haze levels for Class I federal areas affected by PM10-2.5 and crustal PM-2.5.
- EPA's proposed PM-2.5 standards (numeric values) are outside Clean Air Scientific Advisory Committee's and EPA staff recommendations.
- EPA funding support for PM10-2.5 network is nonexistent.
- Prevention of Significant Deterioration (PSD) issues associated with transition from PM-10 to PM10-2.5.

VII. Montana PM Monitoring Data Review & Compliance Projections

Table 1 reviews the current and proposed PM NAAQS. Table 2 projects potential PM-2.5 non-attainment areas in Montana under different NAAQS scenarios. Tables 3 and 4 summarize ambient PM2.5 data by community.

Table 1. Current & Proposed PM-2.5 & PM-10 NAAQS (units are $\mu\text{g}/\text{m}^3$).

FORM	PM-10 (1987)	PM10-2.5 (2006)	PM-2.5 (1997)	PM-2.5 (2006)
24-Hour	150 ¹	70 ³	65 ³	35 ³
Annual	50 ²	na	15 ⁴	15 ⁴

¹ Expected 24-hr average exceedance from statistical calculations based on 3 years of data

² Annual mean from statistical calculations based on 3 years of data

³ 3-year average of the 98th percentile values

⁴ 3-year average of the spatially averaged means

Table 2. Potential PM-2.5 Non-Attainment Areas
(Projected for various 24-hour & annual standard scenarios)

For 35 µg/m ³ 24-hour avg. 98 th Percent.	For 30 µg/m ³ 24-hour avg. 98 th Percent.	For 25 µg/m ³ 24-hour avg. 98 th Percent.	At 13 µg/m ³ Annual Mean 3-yr avg.	At 12 µg/m ³ Annual Mean 3-yr avg.
Missoula (46)	Missoula (46)	Missoula (46)	Libby (15)	Libby (15)
Libby (44)	Libby (44)	Libby (44)	Missoula (11)	Missoula (11)
Hamilton (39)	Hamilton (39)	Hamilton (39)	Whitefish (11)	Whitefish (11)
Butte (37)	Butte (37)	Butte (37)	Butte (10)	Butte (10)
Helena (34)	Helena (34)	Helena (34)		
Whitefish (34)	Whitefish (34)	Whitefish (34)		
Kalispell (31)	Kalispell (31)	Kalispell (31)		
	Belgrade (30)	Belgrade (30)		
	Lincoln (27)	Lincoln (27)		
	Great Falls (27)	Great Falls (27)		
		T. Falls (22)		

Red = currently demonstrating noncompliance

Orange = potential for noncompliance

(##) = PM2.5 concentrations in µg/m³ from 2003 – 2005 monitoring data

Table 3. Annual PM2.5 24-hour Values & 3-Year Averages
(24-hr values are 98th percentile; units are µg/m³)

Location	1999 ¹	2000 ¹	2001 ¹	Avg ³	2002 ²	2003 ²	2004 ²	2005 ²	Avg ³
Belgrade	nd	51	33	nd	25	30	25	36	30
Billings	17	28	23	23	14	22	19	21	21
Bonner	nd	nd	nd	nd	26	42	43	nd	nd
Butte	35	63	22	40	27	44	30	36	37
G. Falls	nd	28	17	nd	18	51	12	18	27
Hamilton	nd	109	34	nd	24	34	45	37	39
Helena	20	41	38	33	18	32	33	38	34
Kalispell	20	27	26	24	24	51	25	18	31
Libby	52	44	45	47	47	43	38	51	44
Lincoln ⁴	nd	nd	29	nd	45	50	14	18	27
Missoula	29	53	44	42	25	49	47	43	46
See. Lake	nd	nd	nd	nd	nd	nd	23	25	nd
T. Falls	nd	nd	16	nd	18	33	18	15	22
Whitefish	27	29	37	31	28	57	23	22	34
W. Yell.	nd	nd	nd	nd	nd	5	18	8	10

¹ Includes all valid data

² Excludes data flagged as 'exceptional events'

³ Averages based on the preceding 3-yr periods; 1999-2001 and 2003-05

⁴ Different monitoring sites between 2002 & 2003

nd = no data

Table 4. Annual PM-2.5 Means & 3-Year Average of Annual Means
(Annual means not calculated as required by 40 CFR Part 50 Appendix N; units are $\mu\text{g}/\text{m}^3$)

Location	1999 ¹	2000 ¹	2001 ¹	Avg. ³	2002 ²	2003 ²	2004 ²	2005 ²	Avg. ³
Belgrade	nd	11	9	nd	7	9	7	11	9
Billings	8	9	8	8	7	8	8	7	8
Bonner	nd	nd	nd	nd	10	9	8	nd	nd
Butte	7	14	7	9	7	10	9	10	10
Gr. Falls	nd	8	5	nd	5	7	5	6	6
Hamilton	nd	16	9	nd	7	8	9	8	8
Helena	6	11	9	9	7	8	8	9	8
Kalispell	7	9	8	9	8	10	9	8	9
Libby	16	17	16	16	16	16	14	16	15
Lincoln ⁴	nd	nd	9	nd	11	7	5	4	5
Missoula	10	15	10	12	8	11	11	11	11
See.Lake	nd	nd	nd	nd	nd	nd	12	11	nd
T. Falls	nd	nd	6	nd	6	7	6	6	6
Whitefish	11	12	15	13	9	13	10	10	11
W. Yell.	nd	nd	nd	nd	nd	2	5	4	4

¹ Includes all valid data

² Excludes data flagged as 'exceptional events'

³ Average of annual means based on the preceding 3-yr periods; 1999-2001 and 2003-05

⁴ Different monitoring sites between 2002 & 2003

nd = no data



DEPARTMENT OF HEALTH & HUMAN SERVICES

RECEIVED AUG 25 2004

Public Health Service

Rocky Mountain Labs
903 South 4th Street
Hamilton, MT 59840
Phone: (406) 383-8324
Fax: (406) 363-9218
E-mail: pstewart@niaid.nih.gov

August 24, 2004

Mr. Scott T. Bell
Project Manager
Morrison Maierle, Inc.
901 Technology Blvd.
P. O. Box 1113
Bozeman, MT 59771

Dear Mr. Bell:

Re: Request for Agency Comments
Ravalli County Airport Environmental Assessment of Proposed Improvements

I am in receipt of your letter of August 4, 2004 regarding the Environmental Assessment for the county airport near the City of Hamilton. As a note of clarification, our organization is known as the Rocky Mountain Laboratories (RML), which are part of the National Institute of Allergy and Infectious Diseases, National Institutes of Health. In your EA, you refer to the "Rocky Mountain Public Health Laboratory," so we are unclear whether you have directed your letter to the correct agency.

If you did intend to send your letter to the Rocky Mountain Laboratories in Hamilton, Montana, then our only comment in regard to the EA is that to our knowledge, the RML does not utilize the county airport and instead uses the Missoula International Airport located in Missoula, Montana.

I hope this information clarifies the matter.

Sincerely,

Pat Stewart, Chief,
Administration and Facilities Management

cc:
Dr. Bloom



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August 4, 2004

Rocky Mountain Laboratories
903 S. 4th
Hamilton, MT 59840

Re: Request for Agency Comments
Ravalli County Airport Environmental Assessment of Proposed Improvements

The Board of Ravalli County Commissioners is currently conducting an Environmental Assessment (EA) for the county airport near the City of Hamilton. The EA is being conducted by the engineering firm of Morrison-Maierle, Inc. in accordance with the Federal Aviation Administration (FAA) requirements and guidelines with joint funding from the FAA.

The Ravalli County Airport is located in western Montana, one mile east of the City of Hamilton in Township 6 North, Range 5 East, in Sections 20 and 29 to the Principal Montana Meridian at NAD 83 North Latitude 46 degrees 14' 51.4", and West Longitude 114 degrees 07' 35.8", County of Ravalli, State of Montana.

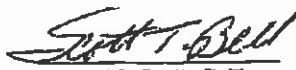
The attached Exhibit shows the location and extent of the improvements proposed for the airport for the time frame ending in the year 2020.

We are requesting interested Agency and individual comments regarding the full twenty year plan of airport developments recommended. Areas of the affected environment of particular interest for which we are soliciting your input include, but are not limited to, the following:

Noise	Endangered and Threatened Species
Compatible Land Use	Wetlands
Air Quality	Flood Plains
Water Quality	Wild and Scenic Rivers
Biotic Communities	Farmlands
Solid Waste	Energy and Natural Resources
DOT Act, Section 4(f) Lands	Light Emissions
Historic, Cultural Resources	Construction Impacts

Thank you in advance for your input and attention to this important matter. Please contact me in our Bozeman office at (406) 587-0721 if you have any questions.

Sincerely,
Morrison-Maierle, Inc.


Scott T. Bell, P.E.
Project Manager

Enclosure
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United States
Department of
Agriculture

Forest
Service

Bitterroot National Forest

1801 N. First
Hamilton, MT 59840
406-363-7100

File Code: 1920-2-5

Date: August 23, 2004

Scott Bell Project Manager
Morrison-Maierle, Inc.
P.O. Box 1113
Bozeman, MT 59771

RECEIVED AUG 26 2004

Dear Mr. Bell:

I am writing in response to your inquiry regarding the proposed improvements at the Ravalli County Airport. In general, the improvements in safety and capability at the airport benefit the Forest Service's flight operations at the facility. The proposed design has integrated our needs, and we have no specific comments at this time.

Thank you for the opportunity to comment. Please keep us on your mailing list as you proceed with your analysis.

Sincerely,

DAVID T. BULL
Forest Supervisor



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August 4, 2004

Bitterroot National Forest
Attn: Sue Heald, Forest Planning Officer
1801 N. First Street
Hamilton, MT 59840

Re: Request for Agency Comments
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Thank you in advance for your input and attention to this important matter. Please contact me in our Bozeman office at (406) 587-0721 if you have any questions.

Sincerely,
Morrison-Maierle, Inc.


Scott T. Bell, P.E.
Project Manager

Enclosure
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August 4, 2004

Department of Natural Resources and Conservation
P.O. Box 202301
Helena, MT 59620-2301

Re: Request for Agency Comments
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Sincerely,
Morrison-Maierle, Inc.


Scott T. Bell, P.E.
Project Manager

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August 4, 2004

Department of State Lands - Southwestern Land Office
1401 27th Avenue
Missoula, MT 59801

Re: Request for Agency Comments
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Sincerely,
Morrison-Maierle, Inc.


Scott T. Bell, P.E.
Project Manager

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August 4, 2004

Northwestern Energy
40 East Broadway
Butte, MT 59701

Re: Request for Agency Comments
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Sincerely,
Morrison-Maierle, Inc.


Scott T. Bell, P.E.
Project Manager

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"Providing resources in partnership with clients to achieve their goals"

August 4, 2004

Ravalli County Economic Development Authority
105 E Main
Hamilton, MT 59840

Re: Request for Agency Comments
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Sincerely,
Morrison-Maierle, Inc.


Scott T. Bell, P.E.
Project Manager

Enclosure
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August 4, 2004

Ravalli County Agricultural & Horticultural Information
Montana Extension Service
205 Bedford
Hamilton, MT 59840

Re: Request for Agency Comments
Ravalli County Airport Environmental Assessment of Proposed Improvements

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Sincerely,
Morrison-Maierle, Inc.


Scott T. Bell, P.E.
Project Manager

Enclosure
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August 4, 2004

Ravalli County Road Department
244 Fairgrounds Road
Hamilton, MT 59840

Re: Request for Agency Comments
Ravalli County Airport Environmental Assessment of Proposed Improvements

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Thank you in advance for your input and attention to this important matter. Please contact me in our Bozeman office at (406) 587-0721 if you have any questions.

Sincerely,
Morrison-Maierle, Inc.


Scott T. Bell, P.E.
Project Manager

Enclosure
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August 4, 2004

Ravalli County Planning Department
215 South 4th St., Suite F
Hamilton, MT 59840

Re: Request for Agency Comments
Ravalli County Airport Environmental Assessment of Proposed Improvements

The Board of Ravalli County Commissioners is currently conducting an Environmental Assessment (EA) for the county airport near the City of Hamilton. The EA is being conducted by the engineering firm of Morrison-Maierle, Inc. in accordance with the Federal Aviation Administration (FAA) requirements and guidelines with joint funding from the FAA.

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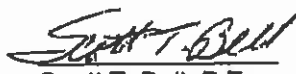
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We are requesting interested Agency and individual comments regarding the full twenty year plan of airport developments recommended. Areas of the affected environment of particular interest for which we are soliciting your input include, but are not limited to, the following:

Noise	Endangered and Threatened Species
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Scott T. Bell, P.E.
Project Manager

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August 4, 2004

Bitterroot Valley Chamber of Commerce
105 E. Main St.
Hamilton, MT 59840

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Project Manager

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August 4, 2004

City of Hamilton
Attn: Mayor Joe Petrusaitis
223 S. 2nd St.
Hamilton, MT 59840

Re: Request for Agency Comments
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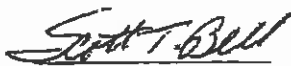
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August 4, 2004

Bitterroot Disposal
172 S. 2nd
Hamilton, MT 59840

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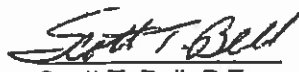
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Scott T. Bell, P.E.
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August 4, 2004

Ravalli County Sherriff Chris Hoffman
205 Bedford
Hamilton, MT 59840

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August 4, 2004

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Chief of Police Alan Auch
223 S. 2nd St.
Hamilton, MT 59840

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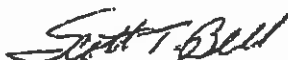
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